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O 045 **Order File Identifier**

Organizing (done) ☐ Two-sided ☐ Rescan Needed

RESCAN

☐ Color Items:

☑ Greyscale Items: 1 Page

☐ Poor Quality Originals:

☐ Other:

DIGITAL DATA

☐ Diskettes, No.

☐ Other, No/Type:

OVERSIZED (Scannable)

☐ Maps:

☐ Other Items Scannable by a Large Scanner

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☐ Logs of various kinds:

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NOTES:

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Scanning Preparation _____ x 30 = _____ + _____ = TOTAL PAGES 223

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Production Scanning

Stage 1 Page Count from Scanned File: 224 (Count **does** include cover sheet)

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Other 45
Permit to Drill and BOPE Regulations

1.	July 26, 2006	Proposed Regulations
2.	July 28, 2006	Notice of Hearing, distribution list
3.	July 28, 2006	File opening memo to AGO Juneau
4.	August 31, 2006	Transcript of Hearing
5.	October 9, 2006	Entire package mailed to the AGO in Juneau
6.	November 6, 2006	Affidavit of Jody Colombie
7.	November 15, 2006	Final Regulations
8.	November 28, 2006	Order Certifying the changes to regulations of AOGCC
9.	December 4, 2006	Changes made by the Lt. Governor's Office

Notice of Adopted Changes to Regulations

On August 31, 2006 the Alaska Oil and Gas Conservation Commission adopted regulation changes in Title 20 of the Alaska Administrative Code, Chapter 25 dealing with Permit to Drill requirements and blowout prevention equipment requirements. The affected regulations are 20 AAC 25.005(c)(4)(A), 20 AAC 25.035(e)(1), 20 AAC 25.035(e)(2), 20 AAC 25.035(e)(4), 20 AAC 25.035(e)(10), 20 AAC 25.036(c)(1), 20 AAC 25.036(c)(2), 20 AAC 25.036(c)(4)(H), 20 AAC 25.036(d), 20 AAC 25.280(b), 20 AAC 25.285(c)(2), 20 AAC 25.285(c)(3), 20 AAC 25.285(c)(9)(A), 20 AAC 25.285(c)(10), 20 AAC 25.285(f), 20 AAC 25.286(d)(1), 20 AAC 25.286(d)(3), 20 AAC 25.286(e). The regulation changes were reviewed and approved by the Department of Law, signed and filed by the Lieutenant Governor on November 28, 2006, and will go into effect on December 28, 2006. The new regulations will be printed in Register 180, January 2007 of the Alaska Administrative Code.

For further information or to obtain a copy of the amended regulations, contact Jody Colombie, Alaska Oil and Gas Conservation Commission, at (907) 793-1221, fax (907) 276-7542, or e-mail Jody_Colombie@admin.state.ak.us.

20 AAC 25.005(c)(4)(A) is amended to read:

(A) the maximum downhole pressure that may be encountered, criteria used to determine it, and maximum potential surface pressure based on a **pressure gradient to surface of 0.1 psi per foot of true vertical depth, unless the commission approves a different pressure gradient that provides a more accurate means of determining the maximum potential surface pressure** [METHANE GRADIENT];

(Eff. 4/13/80, Register 74; am 4/2/86, Register 97; am 11/7/99, Register 152; am 6/4/2000, Register 154; am 1/5/2006, Register 177; am ____/____/____, Register____)

Authority: AS 31.05.030 AS 31.05.090

20 AAC 25.035(e)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) or drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP

STACK EQUAL TO OR GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or** [,] tubing [, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 3,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.035(e)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA **and** providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used,

20 AAC 25. 035(e)(4)(F) is amended to read:

(F) a kill line and a choke line each connected to a flanged or hubbed outlet on a drilling spool or on the BOP body with two full-opening valves on each outlet, conforming to the following specifications:

(i) the outlets must be at least two inches in nominal diameter, except that for rotary drilling rig operations, if the **operation has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRED BOP IS RATED EQUAL TO OR GREATER THAN API 5K], the nominal diameter of the choke outlets must be at least three inches;

(ii) each valve must be sized at least equal to the required size of the outlet to which it is attached;

(iii) the outer valve on the choke side must be a remotely controlled hydraulic valve;

(iv) the inner valve on both the choke and kill sides may not normally be used for opening or closing on flowing fluid;

20 AAC 25. 035(e)(4)(H) is amended to read:

(H) a choke manifold equipped with

(i) two or more adjustable chokes, one of which must be hydraulic and remotely controlled from near the driller's station if the operation **has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRES A BOP STACK EQUAL TO OR GREATER THAN API 5K];

(ii) a line at least two inches in nominal diameter downstream of each choke;

(iii) immediately upstream of each choke, at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two

full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K]; and

(iv) a bypass line, at least the diameter of the choke line, with at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K];

20 AAC 25.035(e)(10) is amended to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required

working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the components used** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure-tested to the required pressure on the smallest outside diameter (OD) and largest outside diameter (OD) tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(F) after installing casing rams in the BOP stack, the ram bonnets must be tested to the required pressure before running casing;

(G) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), **and must be provided to the commission, in a format approved by the commission, within five days after completing the test;**

(H) [(F)] at least 24 hours notice of each BOPE function pressure test must be provided to the commission so that a commission representative can witness the test;

(Eff. 4/13/80, Register 74; am 2/22/81, Register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.036(c)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner, or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; [AND]

(B) for an operation **other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP

STACK GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or** [,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.036(c)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; [AND]

(B) for an operation**, other than a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing [, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars; and

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.036(c)(4)(H) is amended to read:

(H) for conventional open loop fluid process drilling operations, a choke manifold equipped with

(i) two or more adjustable chokes, one of which must be hydraulic and remotely controlled from near the driller's or operator's station if the operation **has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRES A BOP STACK EQUAL TO OR GREATER THAN API 5K];

(ii) a line at least two inches in nominal diameter downstream of each choke;

(iii) immediately upstream of each choke, at least one full-opening valve for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K]; and

(iv) a bypass line at least two inches in nominal diameter with at least one full-opening valve immediately upstream of each choke for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], or with at least two full-opening valves immediately upstream of each choke for an operation **with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K];

20 AAC 25.036(d) is amended to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the components used** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the [BHA] clears the BOP;

(6) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure-tested to the required pressure on the smallest outside diameter (OD) and largest outside (OD) tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(7) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within five days after completing the test**;

(8) [(7)] at least 24 hours notice of each **BOPE** function pressure test must be provided to the commission so that a representative of the commission can witness the test.

(Eff. 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.280(b) is amended to read:

(b) The Application for Sundry Approvals must set out

(1) the current condition of the well;

(2) a copy of the proposed program for well work;

(3) unless already on file with the commission, a diagram and description of the well control equipment to be used, including if applicable a list of the blowout prevention equipment (BOPE) with specifications;

(4) **the maximum downhole pressure that may be encountered, criteria used to determine it, and the maximum potential surface pressure based on a pressure gradient to surface of 0.1 psi per foot of true vertical depth, unless the commission approves a different pressure gradient that provides a more accurate means of determining the maximum potential surface pressure, such as using a stabilized shut-in tubing pressure;**

(5) a description of any wellbore fluid to be used for primary well control; and

(6) [(5)] the current bottom-hole pressure, or, if data setting out the actual pressure are not available, an estimate of the current bottom-hole pressure.

(Eff. 4/2/86, Register 97; am 11/7/99, Register 152; am____/____/____, Register_____)

Authority: AS 31.05.030

20 AAC 25.285(c)(2) is amended to read:

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAT API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, **liner** or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; [AND]

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or** [,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(C) for a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.285(c)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; [AND]

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing [, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars; and

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.285(c)(9)(A) is amended to read:

(9) a kill line and a choke line each connected to a flanged or hubbed outlet on a drilling spool or on the BOP body with two full-opening valves on each outlet, conforming to the following specifications:

(A) the outlets must be at least two inches in nominal diameter, except that for rotary drilling rig operations, if the **operation has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRED BOP IS RATED EQUAL TO OR GREATER THAN API 5K], the nominal diameter of the choke outlets must be at least three inches;

(B) each valve must be sized at least equal to the required size of the outlet to which it is attached;

(C) the outer valve on the choke side must be a remotely controlled hydraulic valve;

(D) the inner valve on both the choke and kill sides may not normally be used for opening or closing on flowing fluid; and

20 AAC 25.285(c)(10) is amended to read:

(10) a choke manifold equipped with

(A) two or more adjustable chokes, one of which must be hydraulic and remotely controlled from near the driller's station if the operation **has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRES A BOP STACK EQUAL TO OR GREATER THAN API 5K];

(B) a line at least two inches in nominal diameter downstream of each choke;

(C) immediately upstream of each choke, at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening

valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K]; and

(D) a bypass line, at least two inches in nominal diameter, with at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K].

20 AAC 25.285(f) is amended to read:

(f) The BOPE must be tested as follows:

(1) when installed, repaired, or changed, and at least once a week thereafter, BOPE, including emergency valves and choke manifolds, must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which the BOPE may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the components used** [IT] must be function pressure-tested before the next wellbore entry, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under

20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which that equipment may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure-tested to the required pressure on the smallest outside diameter (OD) and largest outside diameter (OD) tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(5) after installing casing rams in the BOP stack, the ram bonnets must be tested to the required pressure before running casing;

(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within five days after completing the test;**

(7) [(5)] at least 24 hours notice of each **BOPE** function pressure test must be provided so that a representative of the commission can witness the test**;**

(8) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

(Eff. 4/2/86, Register 97; am 11/7/99, Register 152; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.286(d)(2) is amended to read:

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe or[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.286(d)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer; and

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(B) for an operation **with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers; and

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

20 AAC 25.286(e) is amended to read:

(e) The operator shall test the BOPE assembly as follows:

(1) at least once a week, and after each [USE,] repair, [OR] change, **or use for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, BOP equipment** [BOPE PIPE AND BLIND RAMS] must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which they may be subjected, except that the annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) after each installation of BOPE or other well control equipment, the equipment must be pressure-tested, before wellbore entry, to the maximum potential wellhead pressure to which it may be subjected, except that when testing against the annular type preventer, pressure testing need not exceed 50 percent of the rated working pressure of the annular type preventer;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) after each well installation of the BOPE, the BOPE hydraulic connections to the rams must be visually verified before wellbore entry;

(5) for each BOPE test during drilling and completion operations, variable bore rams must be function pressure-tested to the required pressure on the smallest outside diameter (OD) and largest outside diameter (OD) tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), and must be provided to the commission, in a format approved by the commission, within five days after completing the test;

(7) at least 24 hours notice of each BOPE function pressure test must be provided so that a representative of the commission can witness the test;

(8) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

(Eff. 11/7/99, Register 152; am____/____/____, Register ____)

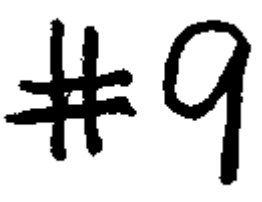
Authority: AS 31.05.030

Subject: Amended Regulations
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Thu, 28 Dec 2006 09:51:53 -0900
To: undisclosed-recipients:;
BCC: Christine Hansen <c.hansen@iogcc.state.ok.us>, Terrie Hubble <hubbletl@bp.com>, Sondra Stewman <StewmaSD@BP.com>, stanekj <stanekj@unocal.com>, ecolaw <ecolaw@trustees.org>, trmjr1 <trmjr1@aol.com>, jdarlington <jdarlington@forestoil.com>, nelson <knelson@petroleumnews.com>, cboddy <cboddy@usibelli.com>, Mark Dalton <mark.dalton@hdrinc.com>, Shannon Donnelly <shannon.donnelly@conocophillips.com>, "Mark P. Worcester" <mark.p.worcester@conocophillips.com>, Bob <bob@inletkeeper.org>, wdv <wdv@dnr.state.ak.us>, tjr <tjr@dnr.state.ak.us>, bbritch <bbritch@alaska.net>, mjnelson <mjnelson@purvingertz.com>, Charles O'Donnell <charles.o'donnell@veco.com>, "Randy L. Skillern" <SkilleRL@BP.com>, "Deborah J. Jones" <JonesD6@BP.com>, "Steven R. Rossberg" <RossbeRS@BP.com>, Lois <lois@inletkeeper.org>, Dan Bross <kuacnews@kuac.org>, Gordon Pospisil <PospisG@BP.com>, "Francis S. Sommer" <SommerFS@BP.com>, Mikel Schultz <Mikel.Schultz@BP.com>, "Nick W. Glover" <GloverNW@BP.com>, "Daryl J. Kleppin" <KleppiDE@BP.com>, "Janet D. Platt" <PlattJD@BP.com>, "Rosanne M. Jacobsen" <JacobsRM@BP.com>, ddonkel <ddonkel@cfl.rr.com>, mckay <mckay@gci.net>, Barbara F Fullmer <barbara.f.fullmer@conocophillips.com>, Charles Barker <barker@usgs.gov>, doug_schultze <doug_schultze@xtoenergy.com>, Hank Alford <hank.alford@exxonmobil.com>, Mark Kovac <yesno1@gci.net>, gspfoff <gspfoff@aurorapower.com>, Gregg Nady <gregg.nady@shell.com>, Fred Steece <fred.steece@state.sd.us>, rcrotty <rcrotty@ch2m.com>, jejones <jejones@aurorapower.com>, dapa <dapa@alaska.net>, jroderick <jroderick@gci.net>, eyancy <eyancy@seal-tite.net>, "James M. Ruud" <james.m.ruud@conocophillips.com>, Brit Lively <mapalaska@ak.net>, jah <jah@dnr.state.ak.us>, buonoje <buonoje@bp.com>, Mark Hanley <mark_hanley@anadarko.com>, Julie Houle <julie_houle@dnr.state.ak.us>, John W Katz <jwkatz@sso.org>, tablerk <tablerk@unocal.com>, Brady <brady@aoga.org>, Brian Havelock <beh@dnr.state.ak.us>, bpopp <bpopp@borough.kenai.ak.us>, Jim White <jimwhite@satx.rr.com>, "John S. Haworth" <john.s.haworth@exxonmobil.com>, marty <marty@rkindustrial.com>, ghammons <ghammons@aol.com>, rmclean <rmclean@pobox.alaska.net>, mkm7200 <mkm7200@aol.com>, Brian Gillespie <ifbmg@uaa.alaska.edu>, David L Boelens <dboelens@aurorapower.com>, Todd Durkee <TDURKEE@KMG.com>, Gary Schultz <gary_schultz@dnr.state.ak.us>, Wayne Rancier <RANCIER@petro-canada.ca>, Brandon Gagnon <bgagnon@brenalaw.com>, Paul Winslow <pmwinslow@forestoil.com>, Sharmaine Copeland <copelasv@bp.com>, Kristin Dirks <kristin_dirks@dnr.state.ak.us>, Kaynell Zeman <kjzeman@marathonoil.com>, John Tower <John.Tower@eia.doe.gov>, Bill Fowler <Bill_Fowler@anadarko.COM>, Scott Cranswick <scott.cranswick@mms.gov>, Brad McKim <mckimbs@BP.com>, Steve Lambe <lambes@unocal.com>, jack newell <jack.newell@acsalaska.net>, James Scherr <james.scherr@mms.gov>, n1617@conocophillips.com, Tim Lawlor <Tim_Lawlor@ak.blm.gov>, Lynnda Kahn <Lynnda_Kahn@fws.gov>, Jerry Dethlefs <Jerry.C.Dethlefs@conocophillips.com>, crockett@aoga.org, Tamera Sheffield <sheffield@aoga.org>, Jon Goltz <Jon.Goltz@conocophillips.com>, Roger Belman <roger.belman@conocophillips.com>, Mindy Lewis <mlewis@brenalaw.com>, Kari Moriarty <moriarty@aoga.org>, Patty Alfaro <palfaro@yahoo.com>, Jeff <smetankaj@unocal.com>, Gary Rogers <gary_rogers@revenue.state.ak.us>, Arthur Copoulos <Arthur_Copoulos@dnr.state.ak.us>, Ken <ken@secorp-inc.com>, Steve Lambert <salambert@unocal.com>, Joe Nicks <news@radiokenai.com>, Jerry McCutcheon <susitnahydronow@yahoo.com>, Bill Walker <bill-wwa@ak.net>, Iris Matthews <Iris_Matthews@legis.state.ak.us>, Paul Decker <paul_decker@dnr.state.ak.us>, Aleutians East Borough

<admin@aleutianseast.org>, Marquerite kremer <marguerite_kremer@dnr.state.ak.us>, Mike Mason <mike@kbbi.org>, Garland Robinson <gbrobinson@marathonoil.com>, Cammy Taylor <Camille_Taylor@law.state.ak.us>, Winton G Aubert <winton_aubert@admin.state.ak.us>, Thomas E Maunder <tom_maunder@admin.state.ak.us>, Stephen F Davies <steve_davies@admin.state.ak.us>, Keith Wiles <kwiles@marathonoil.com>, Deanna Gamble <dgamble@kakivik.com>, James B Regg <jim_regg@admin.state.ak.us>, Catherine P Foerster <cathy_foerster@admin.state.ak.us>, Bob <Bob@fairweather.com>, gregory micallef <micallef@clearwire.net>, Laura Silliphant <laura_silliphant@dnr.state.ak.us>, David Steingreaber <david.e.steingreaber@exxonmobil.com>, akpratts@acsalaska.net, Robert Campbell <Robert.Campbell@reuters.com>, Steve Moothart <steve_moothart@dnr.state.ak.us>, Anna Raff <anna.raff@dowjones.com>, Cliff Posey <cliff@posey.org>, Paul Bloom <paul_bloom@ml.com>, Meghan Powell <Meghan.Powell@asrcenergy.com>, Temple Davidson <temple_davidson@dnr.state.ak.us>, Walter Featherly <WFeatherly@PattonBoggs.com>, Tricia Waggoner <twaggoner@nrginc.com>, Mike Stockinger <Mike.Stockinger@anadarko.com>, , John Spain <jps@stateside.com>

This serves as a notification that the Alaska Oil and Gas Conservation has adopted regulation changes in Title 20 of the Administrative Code, Chapter 25 dealing with Permit to Drill and Blowout Prevention Equipment requirements. These adopted regulations can be found on our website at aogcc.alaska.gov. If you have any questions, please feel free e-mail or call me at 907-793-1221. Jody Colombie, Special Assistant to the Commission

Jody Colombie <jody_colombie@admin.state.ak.us>
Special Staff Assistant
Alaska Oil and Gas Conservation Commission
Department of Administration



Office of the Attorney General
Oil, Gas & Mining Section
1031 W. 4th Avenue, Suite 200
Anchorage, AK 99501-1994
Phone: (907) 269-5255
Fax: (907) 279-8644

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To: Jody

Fax #: 276-7542

From: Cammy

Date: 12/4/06

Subject: Rep Session

Pages: 5, including cover sheet

Message:

here are the changes made by the Lt. Gov's office.

*If you do not receive all the pages or have any problems with this fax, please call for assistance at **(907) 269-5255.***

****
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To: Jody Fax #: 276-7542

From: Cammy Date: 12/4/06

Subject: Regs Revision Pages: 5, including cover sheet

Message:

here are the changes made by the Lt. Gov's office.

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the components used** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest outside diameter (OD) and largest OD tubulars that may be used during**

ACH 11/27/2006

outside diameter

ACH 11/27/2006

specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BRA clears the BOP; BHA XCH 11/27/2006

(6) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD outside diameter and largest OD outside diameter tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;** XCH 11/27/2006 XCH 11/27/2006

(7) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within five days after completing the test;** no bold or underline

(8) [(7)] at least 24 hours notice of each **BOPE** function pressure test must be provided to the commission so that a representative of the commission can witness the test.

~~History:~~ (Eff. 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.280(b) is amended to ~~add a new paragraph~~ read:

(b) The Application for Sundry Approvals must set out

(2) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness**, **the components used** [IT] must be function pressure-tested before the next wellbore entry, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which that equipment may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

AOGCC 11/27/2006

(4) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD (outside diameter) and largest OD (outside diameter) tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

AOGCC 11/27/2006

(5) After installing casing rams in the BOP stack, the ram bonnets must be tested to the required pressure before running casing.

(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within five days after completing the test;**

(7) [(5)] at least 24 hours notice of each **BOPE** function pressure test must be provided so that a representative of the commission can witness the test;[.]

(2) after each installation of BOPE or other well control equipment, the equipment must be pressure-tested, before wellbore entry, to the maximum potential wellhead pressure to which it may be subjected, except that when testing against the annular type preventer, pressure testing need not exceed 50 percent of the rated working pressure of the annular type preventer;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) after each well installation of the BOPE, the BOPE hydraulic connections to the rams must be visually verified before wellbore entry;[ ]

(5) for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest (OD) and largest (OD) tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), and must be provided to the commission, in a format approved by the commission, within five days after completing the test;

(7) at least 24 hours notice of each BOPE function pressure test must be provided so that a representative of the commission can witness the test;

(8) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

ORDER CERTIFYING THE CHANGES TO REGULATIONS OF ALASKA OIL AND GAS CONSERVATION COMMISSION

The attached 26 pages of regulations, dealing with Permit to Drill requirements and blowout prevention equipment under 20 AAC 25 are hereby certified to be a correct copy of the regulation changes that the Alaska Oil and Gas Conservation Commission adopted at its September 27, 2006 meeting, under the authority of AS 31.05.030 and 31.05.040 and after compliance with the Administrative Procedure Act (AS 44.62), specifically including notice under AS 44.62.190 and 44.62.200 and opportunity for public comment under AS 44.62.210.

This action is not expected to require an increased appropriation.

On the record, in considering public comments, the Alaska Oil and Gas Conservation Commission paid special attention to the cost to private persons of the regulatory action being taken.

The regulation changes described in this order take effect on the 30th day after they have been filed by the lieutenant governor, as provided in AS 44.62.180.

DATE: October 9, 2006
Anchorage

Cathy P. Foerster
Commissioner

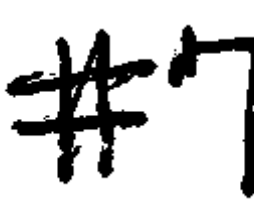
FILING CERTIFICATION

I, Loren Leman, Lieutenant Governor for the State of Alaska, certify that on November 28, 2006 at 11:37 a.m., I filed the attached regulations according to the provisions of AS 44.62.040 – 44.62.120.

Loren D. Leman
Lieutenant Governor

Effective: December 28, 2006

Register: 180, January



MEMORANDUM

State of Alaska
Department of Law

To: John K. Norman, Chair
Oil & Gas Conservation Commission
Dept. of Administration

Date: November 15, 2006

File No.: 993-07-0029

Tel. No.: 465-3600

From: Deborah E. Behr
Chief Assistant Attorney General
and Regulations Attorney
Legislation and Regulations Section

Re: Alaska Oil and Gas Conservation Commission Regulations Re: Permit to Drill Requirements and Blowout Prevention Equipment (20 AAC 25)

Under AS 44.62.060, we have reviewed the Alaska Oil and Gas Conservation Commission's adoption, amendment, and repeal of these regulations and approve the changes for filing by the lieutenant governor. A duplicate original of this memorandum is being furnished the lieutenant governor, along with the 26 pages of regulations and the related documents.

You might wish to contact the lieutenant governor's office to confirm the filing date and effective date of the attached regulation changes.

The July 26, 2006 public notice and the October 9, 2006 certification order both state that this action is not expected to require an increased appropriation. Therefore, a fiscal note under AS 44.62.195 is not required.

In accordance with AS 44.62.125(b)(6), some corrections have been made in the regulations, as shown on the attached copy.

DEB:pvp

cc w/enc.:
Kevin Brooks, Regulations Contact
Dept. of Administration

Cammy Taylor, Assistant Attorney General
Anchorage

MEMORANDUM

State of Alaska
Department of Law

To: Hon. Loren Leman
Lt. Governor

Date: November 15, 2006

File No.: 993-07-0029

Tel. No.: 465-3600

From: Deborah E. Behr
Chief Assistant Attorney General
and Regulations Attorney
Legislation and Regulations Section

Re: Alaska Oil and Gas Conservation Commission Regulations Re: Permit to Drill Requirements and Blowout Prevention Equipment (20 AAC 25)

We have reviewed the attached regulations from the Alaska Oil and Gas Conservation Commission (AOGCC). A duplicate of this memorandum is being furnished to Chair John K. Norman, along with a copy of the regulations.

The Department of Law has reviewed the attached regulations against the statutory standards of the Administrative Procedure Act. Based upon our review, we find no legal problems. This memorandum and the attached duplicate memorandum dated November 15, 2006 constitute the written statement of approval under AS 44.62.060(b) and (c) that authorizes your office to file the attached regulations.

The regulation changes were adopted by the AOGCC after the close of the public comment period. The regulations concern permit to drill requirements and blowout prevention equipment.

The certification order for the regulations states that this action is not expected to require an increased appropriation. Therefore, a fiscal note under AS 44.62.195 is not required.

We have made technical corrections to conform the regulations with the drafting manual under AS 44.62.060 and 44.62.125. The corrections are shown on the attached copy of the regulations.

DEB:pvp

cc: John K. Norman, Chair
Oil & Gas Conservation Commission
Dept. of Administration

20 AAC 25.005(c)(4)(A) is amended to read:

(A) the maximum downhole pressure that may be encountered, criteria used to determine it, and maximum potential surface pressure based on a **pressure gradient to surface of 0.1 psi per foot of true vertical depth, unless the commission approves a different pressure gradient that provides a more accurate means of determining the maximum potential surface pressure** [METHANE GRADIENT];

(Eff. 4/13/80, Register 74; am 4/2/86, Register 97; am 11/7/99, Register 152; am 6/4/2000, Register 154; am 1/5/2006, Register 177; am ____/____/____, Register____)

Authority: AS 31.05.030 AS 31.05.090

20 AAC 25.035(e)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) or drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or**[,] tubing [, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 3,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.035(e)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA **and** providing for pressure

integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used.

← 20 AAC 25. 035(e)(4)(F) is amended to read:

(F) a kill line and a choke line each connected to a flanged or hubbed outlet on a drilling spool or on the BOP body with two full-opening valves on each outlet, conforming to the following specifications:

(i) the outlets must be at least two inches in nominal diameter, except that for rotary drilling rig operations, if the **operation has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRED BOP IS RATED EQUAL TO OR GREATER THAN API 5K], the nominal diameter of the choke outlets must be at least three inches;

(ii) each valve must be sized at least equal to the required size of the outlet to which it is attached;

(iii) the outer valve on the choke side must be a remotely controlled hydraulic valve;

(iv) the inner valve on both the choke and kill sides may not normally be used for opening or closing on flowing fluid;

←—20 AAC 25. 035(e)(4)(H) is amended to read:

(H) a choke manifold equipped with

(i) two or more adjustable chokes, one of which must be hydraulic and remotely controlled from near the driller's station if the operation **has a maximum potential surface pressure of greater than 3,000** psi [REQUIRES A BOP STACK EQUAL TO OR GREATER THAN API 5K];

(ii) a line at least two inches in nominal diameter downstream of each choke;

(iii) immediately upstream of each choke, at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K]; and

(iv) a bypass line, at least the diameter of the choke line, with at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K];

20 AAC 25.035(e)(10) is amended to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the components used** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest outside diameter (OD) and largest OD tubulars that may be used during**

that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

(F) after installing casing rams in the BOP stack, the ram bonnets must be tested to the required pressure before running casing;

(G) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), **and must be provided to the commission, in a format approved by the commission, within five days after completing the test;**

(H) [(F)] at least 24 hours notice of each BOPE function pressure test must be provided to the commission so that a commission representative can witness the test;

(~~History:~~ Eff. 4/13/80, Register 74; am 2/22/81, Register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.036(c)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner, or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; [~~and~~ AND]

(B) for an operation **other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or**[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.036(c)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; ~~and~~ AND

(B) for an operation**, other than a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars; and

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.036(c)(4)(H) is amended to read:

(H) for conventional open loop fluid process drilling operations, a choke manifold equipped with

(i) two or more adjustable chokes, one of which must be hydraulic and remotely controlled from near the driller's or operator's station if the operation **has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRES A BOP STACK EQUAL TO OR GREATER THAN API 5K];

(ii) a line at least two inches in nominal diameter downstream of each choke;

(iii) immediately upstream of each choke, at least one full-opening valve for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K]; and

(iv) a bypass line at least two inches in nominal diameter with at least one full-opening valve immediately upstream of each choke for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], or with at least two full-opening valves immediately upstream of each choke for an operation **with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K];

20 AAC 25.036(d) is amended to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the components used** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure

specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the ~~BRA~~ BHA clears the BOP;

(6) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest (OD** outside diameter **and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(7) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within five days after completing the test;** no bold or underline

(8) [(7)] at least 24 hours notice of each **BOPE** function pressure test must be provided to the commission so that a representative of the commission can witness the test.

~~History:~~ (Eff. 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.280(b) is amended to ~~add a new paragraph~~ read:

(b) The Application for Sundry Approvals must set out

(1) the current condition of the well;

(2) a copy of the proposed program for well work;

(3) unless already on file with the commission, a diagram and description of the well control equipment to be used, including if applicable a list of the blowout prevention equipment (BOPE) with specifications;

(4) **the maximum downhole pressure that may be encountered, criteria used to determine it, and ~~the~~ maximum potential surface pressure based on a pressure gradient to surface of 0.1 psi per foot of true vertical depth, unless the commission approves a different pressure gradient that provides a more accurate means of determining the maximum potential surface pressure, such as using a stabilized shut-in tubing pressure.**

(5) a description of any wellbore fluid to be used for primary well control; and

(6) [(5)] the current bottom-hole pressure, or, if data setting out the actual pressure are not available, an estimate of the current bottom-hole pressure.

~~History:~~ (Eff. 4/2/86, Register 97; am 11/7/99, Register 152; am____/____/____, Register_____)

Authority: AS 31.05.030

← 20 AAC 25.285(c)(2) is amended to read:

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAT API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, **liner** or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; ~~and~~ AND

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi,** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or**[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(C) for a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.285(c)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; ~~and~~ [AND]

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA **and** providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars; and

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.285(c)(9)(A) is amended to read:

(9) a kill line and a choke line each connected to a flanged or hubbed outlet on a drilling spool or on the BOP body with two full-opening valves on each outlet, conforming to the following specifications:

(A) the outlets must be at least two inches in nominal diameter, except that for rotary drilling rig operations, if the **operation has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRED BOP IS RATED EQUAL TO OR GREATER THAN API 5K], the nominal diameter of the choke outlets must be at least three inches;

(B) each valve must be sized at least equal to the required size of the outlet to which it is attached;

(C) the outer valve on the choke side must be a remotely controlled hydraulic valve;

(D) the inner valve on both the choke and kill sides may not normally be used for opening or closing on flowing fluid; and

20 AAC 25.285(c)(10) is amended to read:

(10) a choke manifold equipped with

(A) two or more adjustable chokes, one of which must be hydraulic and remotely controlled from near the driller's station if the operation **has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRES A BOP STACK EQUAL TO OR GREATER THAN API 5K];

(B) a line at least two inches in nominal diameter downstream of each choke;

(C) immediately upstream of each choke, at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K]; and

(D) a bypass line, at least two inches in nominal diameter, with at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K].

20 AAC 25.285(f) is amended to read:

(f) The BOPE must be tested as follows:

(1) when installed, repaired, or changed, and at least once a week thereafter, BOPE, including emergency valves and choke manifolds, must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which the BOPE may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness**, **the components used** [IT] must be function pressure-tested before the next wellbore entry, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which that equipment may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest (OD) outside diameter and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(5) After installing casing rams in the BOP stack, the ram bonnets must be tested to the required pressure before running casing.

(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within five days after completing the test;**

(7) [(5)] at least 24 hours notice of each **BOPE** function pressure test must be provided so that a representative of the commission can witness the test;[.]

(8) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well. no bold or underline

History: (Eff. 4/2/86, Register 97; am 11/7/99, Register 152; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.286(d)(2) is amended to read:

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe or[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

<— 20 AAC 25.286(d)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer; and

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(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(B) for an operation **with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers; and

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

20 AAC 25.286(e) is amended to read:

(e) The operator shall test the BOPE assembly as follows:

(1) at least once a week, and after each [USE,] repair, [OR] change, **or use for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness,** BOP[E] **equipment** [PIPE AND BLIND RAMS] must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which they may be subjected, except that the annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) after each installation of BOPE or other well control equipment, the equipment must be pressure-tested, before wellbore entry, to the maximum potential wellhead pressure to which it may be subjected, except that when testing against the annular type preventer, pressure testing need not exceed 50 percent of the rated working pressure of the annular type preventer;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) after each well installation of the BOPE, the BOPE hydraulic connections to the rams must be visually verified before wellbore entry;[.]

(5) for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

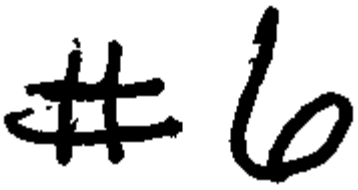
(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), and must be provided to the commission, in a format approved by the commission, within five days after completing the test;

(7) at least 24 hours notice of each BOPE function pressure test must be provided so that a representative of the commission can witness the test;

(8) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well. (no bold or underline)

History: (Eff. 11/7/99, Register 152; am____/____/____, Register ____)

Authority: AS 31.05.030



STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

AFFIDAVIT OF NOTICE OF PROPOSED ADOPTION OF REGULATIONS AND FURNISHING OF ADDITIONAL INFORMATION

I, Jody J. Colombie, Special Staff Assistant, of Alaska Oil and Gas Conservation Commission, being sworn, state the following:

As required by AS 44.62.190, notice of the proposed adoption of changes to 20 AAC 25, Permit to Drill Requirements and Blowout Prevention Equipment Requirements has been given by being

(1) published in a newspaper or trade publication;
(2) furnished to interested persons;
(3) furnished to appropriate state officials;
(4) furnished to the Department of Law, along with a copy of the proposed regulations;
(5) electronically transmitted to incumbent State of Alaska legislators;
(6) furnished to the Legislative Affairs Agency, Legislative Library;
(7) posted on the Alaska Online Public Notice System as required by AS 44.62.175(a)(1) and (b) and 44.62.190(a)(1);
(8) furnished electronically, along with a copy of the proposed regulations, to the Legislative Affairs Agency, the chair of the House and Senate Resources Committee, House Special Committee on Oil and Gas, and the Administrative Regulation Review Committee, and the legislative council.

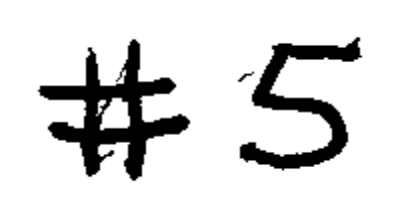
As required by AS 44.62.190(d), additional regulations notice information regarding the proposed adoption of the regulation changes described above has been furnished to interested persons and those in (5) and (6) of the list above. The additional regulations notice information also has been posted on the Alaska Online Public Notice System.

DATE: 11.6.06
Anchorage, Alaska

Jody J. Colombie
Special Staff Assistant

SUBSCRIBED AND SWORN TO before me this 6 day of November, 2006.

Notary Public in and for the
State of Alaska
My commission expires: 11/11/06.


#5

MEMORANDUM STATE OF ALASKA

ALASKA OIL AND GAS CONSERVATION COMMISSION

TO: Regulations Attorney
Legislation/Regulation Section
Department of Law

DATE: October 9, 2006

SUBJECT: Request for Legal Review of Regulations Project on dealing with the method of determining a well's maximum potential surface pressure and blowout prevention equipment
993-07-0029
20 AAC 25.005 - .286

FROM: Cathy P Foerster
Regulations Contact
Department of Administration

We are requesting legal review and approval of the attached final regulations on changes to the method of determining a well's maximum potential surface pressure and blowout prevention equipment, which were adopted by Alaska Oil and Gas Conservation Commission.

Enclosed are the following documents:

1. the original and one copy of the final regulations for the Department of Law's use;
2. the original of the signed and dated certification order;
3. the original of the public notice;
4. the original of the additional regulations notice information form distributed with the notice;
5. the original of the publishers' affidavit of publication;
6. the original of the affidavit of notice;
7. affidavit of oral hearing
8. affidavit of commission action;
9. excerpt from unapproved minutes from the September 27, 2006 meeting;

We have worked with Assistant Attorney General Cammy Taylor on this project.

Upon completion of your review, pleas forward the regulations to the lieutenant governor for filing.

20 AAC 25.005(c)(4)(A) is amended to read:

(A) the maximum downhole pressure that may be encountered, criteria used to determine it, and maximum potential surface pressure based on a **pressure gradient to surface of 0.1 psi per foot of true vertical depth, unless the commission approves a different pressure gradient that provides a more accurate means of determining the maximum potential surface pressure** [METHANE GRADIENT];

(Eff. 4/13/80, Register 74; am 4/2/86, Register 97; am 11/7/99, Register 152; am 6/4/2000, Register 154; am 1/5/2006, Register 177; am ____/____/____, Register____)

Authority: AS 31.05.030 AS 31.05.090

20 AAC 25.035(e)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) or drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or**[,] tubing [, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 3,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.035(e)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA **and** providing for pressure

integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used.

20 AAC 25. 035(e)(4)(F) is amended to read:

(F) a kill line and a choke line each connected to a flanged or hubbed outlet on a drilling spool or on the BOP body with two full-opening valves on each outlet, conforming to the following specifications:

(i) the outlets must be at least two inches in nominal diameter, except that for rotary drilling rig operations, if the **operation has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRED BOP IS RATED EQUAL TO OR GREATER THAN API 5K], the nominal diameter of the choke outlets must be at least three inches;

(ii) each valve must be sized at least equal to the required size of the outlet to which it is attached;

(iii) the outer valve on the choke side must be a remotely controlled hydraulic valve;

(iv) the inner valve on both the choke and kill sides may not normally be used for opening or closing on flowing fluid;

20 AAC 25. 035(e)(4)(H) is amended to read:

(H) a choke manifold equipped with

(i) two or more adjustable chokes, one of which must be hydraulic and remotely controlled from near the driller's station if the operation **has a maximum potential surface pressure of greater than 3,000** psi [REQUIRES A BOP STACK EQUAL TO OR GREATER THAN API 5K];

(ii) a line at least two inches in nominal diameter downstream of each choke;

(iii) immediately upstream of each choke, at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K]; and

(iv) a bypass line, at least the diameter of the choke line, with at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K];

20 AAC 25.035(e)(10) is amended to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the components used** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest outside diameter (OD) and largest OD tubulars that may be used during**

that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

(F) after installing casing rams in the BOP stack, the ram bonnets must be tested to the required pressure before running casing.

(G) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), **and must be provided to the commission, in a format approved by the commission, within five days after completing the test;**

(H) [(F)] at least 24 hours notice of each BOPE function pressure test must be provided to the commission so that a commission representative can witness the test;

History: Eff. 4/13/80, Register 74; am 2/22/81, Register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am 10/24/2004, Register 172; am___/___/___, Register ____)

Authority: AS 31.05.030

20 AAC 25.036(c)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner, or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation **other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or**[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.036(c)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.036(c)(4)(H) is amended to read:

(H) for conventional open loop fluid process drilling operations, a choke manifold equipped with

(i) two or more adjustable chokes, one of which must be hydraulic and remotely controlled from near the driller's or operator's station if the operation **has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRES A BOP STACK EQUAL TO OR GREATER THAN API 5K];

(ii) a line at least two inches in nominal diameter downstream of each choke;

(iii) immediately upstream of each choke, at least one full-opening valve for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K]; and

(iv) a bypass line at least two inches in nominal diameter with at least one full-opening valve immediately upstream of each choke for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], or with at least two full-opening valves immediately upstream of each choke for an operation **with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K];

20 AAC 25.036(d) is amended to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the components used** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure

specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BRA clears the BOP;

(6) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(7) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within five days after completing the test;**

(8) [(7)] at least 24 hours notice of each **BOPE** function pressure test must be provided to the commission so that a representative of the commission can witness the test.

History: Eff. 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.280(b) is amended to add a new paragraph:

(b) The Application for Sundry Approvals must set out

(1) the current condition of the well;

(2) a copy of the proposed program for well work;

(3) unless already on file with the commission, a diagram and description of the well control equipment to be used, including if applicable a list of the blowout prevention equipment (BOPE) with specifications;

(4) **the maximum downhole pressure that may be encountered, criteria used to determine it, and maximum potential surface pressure based on a pressure gradient to surface of 0.1 psi per foot of true vertical depth unless the commission approves a different pressure gradient that provides a more accurate means of determining the maximum potential surface pressure, such as using a stabilized shut-in tubing pressure.**

(5) a description of any wellbore fluid to be used for primary well control; and

(6) [(5)] the current bottom-hole pressure, or, if data setting out the actual pressure are not available, an estimate of the current bottom-hole pressure.

History: Eff. 4/2/86, Register 97; am 11/7/99, Register 152; am____/____/____, Register_____)

Authority: AS 31.05.030

20 AAC 25.285(c)(2) is amended to read:

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAT API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, **liner** or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or**[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.285(c)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA **and** providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.285(c)(9)(A) is amended to read:

(9) a kill line and a choke line each connected to a flanged or hubbed outlet on a drilling spool or on the BOP body with two full-opening valves on each outlet, conforming to the following specifications:

(A) the outlets must be at least two inches in nominal diameter, except that for rotary drilling rig operations, if the **operation has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRED BOP IS RATED EQUAL TO OR GREATER THAN API 5K], the nominal diameter of the choke outlets must be at least three inches;

(B) each valve must be sized at least equal to the required size of the outlet to which it is attached;

(C) the outer valve on the choke side must be a remotely controlled hydraulic valve;

(D) the inner valve on both the choke and kill sides may not normally be used for opening or closing on flowing fluid; and

20 AAC 25.285(c)(10) is amended to read:

(10) a choke manifold equipped with

(A) two or more adjustable chokes, one of which must be hydraulic and remotely controlled from near the driller's station if the operation **has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRES A BOP STACK EQUAL TO OR GREATER THAN API 5K];

(B) a line at least two inches in nominal diameter downstream of each choke;

(C) immediately upstream of each choke, at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K]; and

(D) a bypass line, at least two inches in nominal diameter, with at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K].

20 AAC 25.285(f) is amended to read:

(f) The BOPE must be tested as follows:

(1) when installed, repaired, or changed, and at least once a week thereafter, BOPE, including emergency valves and choke manifolds, must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which the BOPE may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness**, **the components used** [IT] must be function pressure-tested before the next wellbore entry, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which that equipment may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(5) After installing casing rams in the BOP stack, the ram bonnets must be tested to the required pressure before running casing.

(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within five days after completing the test;**

(7) [(5)] at least 24 hours notice of each **BOPE** function pressure test must be provided so that a representative of the commission can witness the test;[.]

(8) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

History: Eff. 4/2/86, Register 97; am 11/7/99, Register 152; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.286(d)(2) is amended to read:

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe or[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.286(d)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer; and

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(B) for an operation **with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers; and

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

20 AAC 25.286(e) is amended to read:

(e) The operator shall test the BOPE assembly as follows:

(1) at least once a week, and after each [USE,] repair, [OR] change, **or use for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness,** BOP[E] **equipment** [PIPE AND BLIND RAMS] must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which they may be subjected, except that the annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) after each installation of BOPE or other well control equipment, the equipment must be pressure-tested, before wellbore entry, to the maximum potential wellhead pressure to which it may be subjected, except that when testing against the annular type preventer, pressure testing need not exceed 50 percent of the rated working pressure of the annular type preventer;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) after each well installation of the BOPE, the BOPE hydraulic connections to the rams must be visually verified before wellbore entry;[.]

(5) for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), and must be provided to the commission, in a format approved by the commission, within five days after completing the test;

(7) at least 24 hours notice of each BOPE function pressure test must be provided so that a representative of the commission can witness the test;

(8) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

History: Eff. 11/7/99, Register 152; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.005(c)(4)(A) is amended to read:

(A) the maximum downhole pressure that may be encountered, criteria used to determine it, and maximum potential surface pressure based on a **pressure gradient to surface of 0.1 psi per foot of true vertical depth, unless the commission approves a different pressure gradient that provides a more accurate means of determining the maximum potential surface pressure** [METHANE GRADIENT];

(Eff. 4/13/80, Register 74; am 4/2/86, Register 97; am 11/7/99, Register 152; am 6/4/2000, Register 154; am 1/5/2006, Register 177; am ____/____/____, Register____)

Authority: AS 31.05.030 AS 31.05.090

20 AAC 25.035(e)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) or drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or**[,] tubing [, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 3,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.035(e)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA **and** providing for pressure

integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used.

20 AAC 25. 035(e)(4)(F) is amended to read:

(F) a kill line and a choke line each connected to a flanged or hubbed outlet on a drilling spool or on the BOP body with two full-opening valves on each outlet, conforming to the following specifications:

(i) the outlets must be at least two inches in nominal diameter, except that for rotary drilling rig operations, if the **operation has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRED BOP IS RATED EQUAL TO OR GREATER THAN API 5K], the nominal diameter of the choke outlets must be at least three inches;

(ii) each valve must be sized at least equal to the required size of the outlet to which it is attached;

(iii) the outer valve on the choke side must be a remotely controlled hydraulic valve;

(iv) the inner valve on both the choke and kill sides may not normally be used for opening or closing on flowing fluid;

20 AAC 25. 035(e)(4)(H) is amended to read:

(H) a choke manifold equipped with

(i) two or more adjustable chokes, one of which must be hydraulic and remotely controlled from near the driller's station if the operation **has a maximum potential surface pressure of greater than 3,000** psi [REQUIRES A BOP STACK EQUAL TO OR GREATER THAN API 5K];

(ii) a line at least two inches in nominal diameter downstream of each choke;

(iii) immediately upstream of each choke, at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K]; and

(iv) a bypass line, at least the diameter of the choke line, with at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K];

20 AAC 25.035(e)(10) is amended to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the components used** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest outside diameter (OD) and largest OD tubulars that may be used during**

that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

(F) after installing casing rams in the BOP stack, the ram bonnets must be tested to the required pressure before running casing.

(G) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), **and must be provided to the commission, in a format approved by the commission, within five days after completing the test;**

(H) [(F)] at least 24 hours notice of each BOPE function pressure test must be provided to the commission so that a commission representative can witness the test;

History: Eff. 4/13/80, Register 74; am 2/22/81, Register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.036(c)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner, or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation **other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or**[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.036(c)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

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20 AAC 25.036(c)(4)(H) is amended to read:

(H) for conventional open loop fluid process drilling operations, a choke manifold equipped with

(i) two or more adjustable chokes, one of which must be hydraulic and remotely controlled from near the driller's or operator's station if the operation **has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRES A BOP STACK EQUAL TO OR GREATER THAN API 5K];

(ii) a line at least two inches in nominal diameter downstream of each choke;

(iii) immediately upstream of each choke, at least one full-opening valve for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K]; and

(iv) a bypass line at least two inches in nominal diameter with at least one full-opening valve immediately upstream of each choke for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], or with at least two full-opening valves immediately upstream of each choke for an operation **with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K];

20 AAC 25.036(d) is amended to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the components used** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure

specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BRA clears the BOP;

(6) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(7) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within five days after completing the test;**

(8) [(7)] at least 24 hours notice of each **BOPE** function pressure test must be provided to the commission so that a representative of the commission can witness the test.

History: Eff. 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.280(b) is amended to add a new paragraph:

(b) The Application for Sundry Approvals must set out

(1) the current condition of the well;

(2) a copy of the proposed program for well work;

(3) unless already on file with the commission, a diagram and description of the well control equipment to be used, including if applicable a list of the blowout prevention equipment (BOPE) with specifications;

(4) **the maximum downhole pressure that may be encountered, criteria used to determine it, and maximum potential surface pressure based on a pressure gradient to surface of 0.1 psi per foot of true vertical depth unless the commission approves a different pressure gradient that provides a more accurate means of determining the maximum potential surface pressure, such as using a stabilized shut-in tubing pressure.**

(5) a description of any wellbore fluid to be used for primary well control; and

(6) [(5)] the current bottom-hole pressure, or, if data setting out the actual pressure are not available, an estimate of the current bottom-hole pressure.

History: Eff. 4/2/86, Register 97; am 11/7/99, Register 152; am____/____/____, Register_____)

Authority: AS 31.05.030

20 AAC 25.285(c)(2) is amended to read:

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAT API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, **liner** or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or**[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.285(c)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service:

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(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA **and** providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.285(c)(9)(A) is amended to read:

(9) a kill line and a choke line each connected to a flanged or hubbed outlet on a drilling spool or on the BOP body with two full-opening valves on each outlet, conforming to the following specifications:

(A) the outlets must be at least two inches in nominal diameter, except that for rotary drilling rig operations, if the **operation has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRED BOP IS RATED EQUAL TO OR GREATER THAN API 5K], the nominal diameter of the choke outlets must be at least three inches;

(B) each valve must be sized at least equal to the required size of the outlet to which it is attached;

(C) the outer valve on the choke side must be a remotely controlled hydraulic valve;

(D) the inner valve on both the choke and kill sides may not normally be used for opening or closing on flowing fluid; and

20 AAC 25.285(c)(10) is amended to read:

(10) a choke manifold equipped with

(A) two or more adjustable chokes, one of which must be hydraulic and remotely controlled from near the driller's station if the operation **has a maximum potential surface pressure of greater than 3,000 psi** [REQUIRES A BOP STACK EQUAL TO OR GREATER THAN API 5K];

(B) a line at least two inches in nominal diameter downstream of each choke;

(C) immediately upstream of each choke, at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K]; and

(D) a bypass line, at least two inches in nominal diameter, with at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation **with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K].

20 AAC 25.285(f) is amended to read:

(f) The BOPE must be tested as follows:

(1) when installed, repaired, or changed, and at least once a week thereafter, BOPE, including emergency valves and choke manifolds, must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which the BOPE may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) if **any** BOP [SEALING RAM TYPE] equipment **components have** [HAS] been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the components used** [IT] must be function pressure-tested before the next wellbore entry, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which that equipment may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(5) After installing casing rams in the BOP stack, the ram bonnets must be tested to the required pressure before running casing.

(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within five days after completing the test;**

(7) [(5)] at least 24 hours notice of each **BOPE** function pressure test must be provided so that a representative of the commission can witness the test;[.]

(8) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

History: Eff. 4/2/86, Register 97; am 11/7/99, Register 152; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.286(d)(2) is amended to read:

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe or[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.286(d)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer; and

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(B) for an operation **with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers; and

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

20 AAC 25.286(e) is amended to read:

(e) The operator shall test the BOPE assembly as follows:

(1) at least once a week, and after each [USE,] repair, [OR] change, **or use for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness,** BOP[E] **equipment** [PIPE AND BLIND RAMS] must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which they may be subjected, except that the annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) after each installation of BOPE or other well control equipment, the equipment must be pressure-tested, before wellbore entry, to the maximum potential wellhead pressure to which it may be subjected, except that when testing against the annular type preventer, pressure testing need not exceed 50 percent of the rated working pressure of the annular type preventer;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) after each well installation of the BOPE, the BOPE hydraulic connections to the rams must be visually verified before wellbore entry;[.]

(5) for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), and must be provided to the commission, in a format approved by the commission, within five days after completing the test;

(7) at least 24 hours notice of each BOPE function pressure test must be provided so that a representative of the commission can witness the test;

(8) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

History: Eff. 11/7/99, Register 152; am____/____/____, Register ____)

Authority: AS 31.05.030

ORDER CERTIFYING THE CHANGES TO
REGULATIONS OF ALASKA OIL AND GAS CONSERVATION
COMMISSION

The attached 26 pages of regulations, dealing with Permit to Drill requirements and blowout prevention equipment under 20 AAC 25 are hereby certified to be a correct copy of the regulation changes that the Alaska Oil and Gas Conservation Commission adopted at its September 27, 2006 meeting, under the authority of AS 31.05.030 and 31.05.040 and after compliance with the Administrative Procedure Act (AS 44.62), specifically including notice under AS 44.62.190 and 44.62.200 and opportunity for public comment under AS 44.62.210.

This action is not expected to require an increased appropriation.

On the record, in considering public comments, the Alaska Oil and Gas Conservation Commission paid special attention to the cost to private persons of the regulatory action being taken.

The regulation changes described in this order take effect on the 30th day after they have been filed by the lieutenant governor, as provided in AS 44.62.180.

DATE: October 9, 2006
Anchorage

Cathy P. Foerster
Commissioner

FILING CERTIFICATION

I, Loren Leman, Lieutenant Governor for the State of Alaska, certify that on _____, 2006 at _____ .m., I filed the attached regulations according to the provisions of AS 44.62.040 – 44.62.120.

_____
Lieutenant Governor

Effective: _____.

Register: _____.

STATE OF ALASKA
NOTICE OF PROPOSED CHANGES IN THE REGULATIONS OF THE ALASKA OIL AND GAS CONSERVATION COMMISSION

The Alaska Oil and Gas Conservation Commission ("AOGCC") proposes to adopt regulation changes in Title 20, Chapter 25, of the Alaska Administrative Code, dealing with Permit to Drill requirements and blowout prevention equipment requirements including the following:

The method of determining a well's maximum potential surface pressure is precisely specified in 20 AAC 25.005(c)(4)(A); and

Blowout prevention equipment requirements are clarified in 20 AAC 25.035(e)(1), 20 AAC 25.035(e)(2), 20 AAC 25.035(e)(10), 20 AAC 25.036(c)(1), 20 AAC 25.036(c)(2), 20 AAC 25.036(d), 20 AAC 25.285(c)(2), 20 AAC 25.285(c)(3), 20 AAC 25.285(f), 20 AAC 25.286(d)(1), 20 AAC 25.286(d)(3), 20 AAC 25.286(e)

You may comment on the proposed regulation changes, including the potential costs to private persons of complying with the proposed changes, by writing to AOGCC, 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501. The comments must be received no later than 4:30 p.m. on September 8, 2006.

Oral or written comments may be submitted at a hearing to be held on August 31, 2006 at 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501. The hearing will begin at 9:00 a.m. and might be extended to accommodate those present before 9:30 a.m. who did not have an opportunity to comment.

If you are a person with a disability who may need a special accommodation in order to participate in the process, please contact Jody Colombie at 793-1221 by 4:00 p.m., August 18, 2006 to ensure that any necessary accommodations can be provided.

For a copy of the proposed regulation changes, contact Jody Colombie at AOGCC, 333 W. 7th Avenue, Suite 100, Anchorage, Alaska 99501, or by telephoning the AOGCC at 907-793-1221, or on the AOGCC website at:

http://www.aogcc.alaska.gov.

After the public comment period ends, the AOGCC will either adopt this or another proposal dealing with the same subject, without further notice, or decide to take no action on it. The language of the final regulations may be different from that of the proposed regulations. YOU SHOULD COMMENT DURING THE TIME ALLOWED IF YOUR INTEREST COULD BE AFFECTED. Written comments received are public records and are subject to public inspection.

Statutory Authority: AS 31.05.030.
Statutes Being Implemented, Interpreted, or Made Specific: AS 31.05.030.
Fiscal Information: The proposed regulation changes are not expected to require an increased appropriation.

Date: July 26, 2006

John K. Norman, Chairman
Alaska Oil and Gas Conservation Commission

Published: July 28, 2006
AO-02714001

ADDITIONAL REGULATIONS NOTICE INFORMATION
(AS 44.62.190(d))

1. Adopting agency: Alaska Oil and Gas Conservation Commission.

2. General subject of regulations: Permit to Drill requirements and blowout prevention equipment requirements.

3. Citation of regulations: 20 AAC 25.005(c)(4)(A), 20 AAC 25.035(e)(1), 20 AAC 25.035(e)(2), 20 AAC 25.035(e)(10), 20 AAC 25.036(c)(1), 20 AAC 25.036(c)(2), 20 AAC 25.036(d), 20 AAC 25.285(c)(2), 20 AAC 25.285(c)(3), 20 AAC 25.285(f), 20 AAC 25.286(d)(1), 20 AAC 25.286(d)(3), 20 AAC 25.286(e)

4. Reason for the proposed action: clarification of the subject regulatory requirements.

5. Program category and BRU affected: Alaska Oil and Gas Conservation Commission.

6. Cost of implementation to the state agency: zero.

7. The name of the contact person for the regulations John K. Norman, Alaska Oil and Gas Conservation Commission, 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501, (907) 279-1433.

8. The origin of the proposed action: agency staff.

9. Date: July 26, 2006

10. Prepared by:

John K. Norman, Chairman
Alaska Oil and Gas Conservation Commission
(907) 279-1433

Anchorage Daily News
Affidavit of Publication

1001 Northway Drive, Anchorage, AK 99508

7/28/2006

AD #	DATE	PO	ACCOUNT	PRICE PER DAY	OTHER CHARGES	OTHER CHARGES #2	OTHER CHARGES #3	OTHER CHARGES #4	OTHER CHARGES #5	GRAND TOTAL
889675	07/28/2006	002714001	STOF0330	$270.18						
				$270.18	$0.00	$0.00	$0.00	$0.00	$0.00	$270.18

STATE OF ALASKA
THIRD JUDICIAL DISTRICT

Christine Clark, being first duly sworn on oath deposes and says that she is an advertising representative of the Anchorage Daily News, a daily newspaper.

That said newspaper has been approved by the Third Judicial Court, Anchorage, Alaska, and it now and has been published in the English language continually as a daily newspaper in Anchorage, Alaska, and it is now and during all said time was printed in an office maintained at the aforesaid place of publication of said newspaper. That the annexed is a copy of an advertisement as it was published in regular issues (and not in supplemental form) of said newspaper on the above dates and that such newspaper was regularly distributed to its subscribers during all of said period. That the full amount of the fee charged for the foregoing publication is not in excess of the rate charged private individuals.

Signed _____

Subscribed and sworn to me before this date:

July 31, 2006

Notary Public in and for the State of Alaska.
Third Division. Anchorage, Alaska

MY COMMISSION EXPIRES: 09/12/2007

_____

KIMBERLY A. KIRSY
NOTARY
PUBLIC
STATE OF ALASKA
My Commission Expires Sept. 12, 2007

STATE OF ALASKA
NOTICE OF PROPOSED CHANGES IN THE REGULATIONS OF THE ALASKA OIL AND GAS CONSERVATION COMMISSION

The Alaska Oil and Gas Conservation Commission ("AOGCC") proposes to adopt regulation changes in Title 20, Chapter 25, of the Alaska Administrative Code, dealing with Permit to Drill requirements and blowout prevention equipment requirement s including the following:

The method of determining a well's maximum potential surface pressure is precisely specified in 20 AAC 25.005(c)(4)(A); and

Blowout prevention equipment requirements are clarified in 20 AAC 25.035(e)(1), 20 AAC 25.035(e)(2), 20 AAC 25.035(e)(10), 20 AAC 25.036(c)(1), 20 AAC 25.036(c)(2), 20 AAC 25.036(d), 20 AAC 25.285(c)(2), 20 AAC 25.285(c)(3), 20 AAC 25.285(f), 20 AAC 25.286(d)(1), 20 AAC 25.286(d)(3), 20 AAC 25.286(e)

You may comment on the proposed regulation changes, including the potential costs to private persons of complying with the proposed changes, by writing to AOGCC, 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501. The comments must be received no later than 4:30 p.m. on September 8, 2006.

Oral or written comments may be submitted at a hearing to be held on August 31, 2006 at 333 W. 7th Avenue, Suite 100, Anchorage, AK 99501. The hearing will begin at 9:00 a.m. and might be extended to accommodate those present before 9:30 a.m. who did not have an opportunity to comment.

If you are a person with a disability who may need a special accommodation in order to participate in the process, please contact Jody Colombie at 793-1221 by 4:00 p.m., August 18, 2006 to ensure that any necessary accommodations can be provided.

For a copy of the proposed regulation changes, contact Jody Colombie at AOGCC, 333 W. 7th Avenue, Suite 100, Anchorage, Alaska 99501, or by telephoning the AOGCC at 907-793-1221, or on the AOGCC website at: http://www.aogcc.alaska.gov.

After the public comment period ends, the AOGCC will either adopt this or another proposal dealing with the same subject, without further notice, or decide to take no action on it. The language of the final regulations may be different from that of the proposed regulations. YOU SHOULD COMMENT DURING THE TIME ALLOWED IF YOUR INTEREST COULD BE AFFECTED. Written comments received are public records and are subject to public inspection.

Statutory Authority: AS 31.05.030; AS 31.05.040.
Statutes Being Implemented, Interpreted, or Made Specific: AS 31.05.030.
Fiscal Information: The proposed regulation changes are not expected to require an increased appropriation.

Date: July 26, 2006
/s/: John K. Norman, Chairman
Alaska Oil and Gas Conservation Commission

AO# 02714001
Published: July 28, 2006

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

AFFIDAVIT OF NOTICE OF PROPOSED ADOPTION OF REGULATIONS AND FURNISHING OF ADDITIONAL INFORMATION

I, Jody J. Colombie, Special Staff Assistant, of Alaska Oil and Gas Conservation Commission, being sworn, state the following:

As required by AS 44.62.190, notice of the proposed adoption of changes to 20 AAC 25, Permit to Drill Requirements and Blowout Prevention Equipment Requirements has been given by being

(1) published in a newspaper or trade publication;
(2) furnished to interested persons [as shown on the attached list];
(3) furnished to appropriate state officials;
(4) furnished to the Department of Law, along with a copy of the proposed regulations;
(5) electronically transmitted to incumbent State of Alaska legislators;
(6) furnished to the Legislative Affairs Agency, Legislative Library;
(7) posted on the Alaska Online Public Notice System as required by AS 44.62.175(a)(1) and (b) and 44.62.190(a)(1);
(8) furnished electronically, along with a copy of the proposed regulations, to the Legislative Affairs Agency, the chair of the House and Senate Resources Committee, House Special Committee on Oil and Gas, and the Administrative Regulation Review Committee, and the legislative council.

As required by AS 44.62.190(d), additional regulations notice information regarding the proposed adoption of the regulation changes described above has been furnished to interested persons [as shown on the attached list] and those in (5) and (6) of the list above. The additional regulations notice information also has been posted on the Alaska Online Public Notice System.

DATE: 10/9/06
Anchorage, Alaska

Jody J. Colombie
Special Staff Assistant

SUBSCRIBED AND SWORN TO before me this 9th day of October, 2006.

Notary Public in and for the
State of Alaska
My commission expires: 11/11/06.

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

AFFIDAVIT OF ORAL HEARING

I, Jody J. Colombie, Special Staff Assistant of the Alaska Oil and Gas Conservation Commission, being sworn, state the following:

On August 31, 2006, at 9:00 a.m., 333 West 7th Avenue, Suite 100, Anchorage, Alaska 99501, a public hearing presided over by John K. Norman, Chairman, was held in accordance with AS 44.62.210 for the purpose of taking testimony in connection with the adoption of changes to . 20 AAC 25.005(c)(4)(A), 20 AAC 25.035(e)(1), 20 AAC 25.035(e)(2), 20 AAC 25.035(e)(4), 20 AAC 25.035(e)(10), 20 AAC 25.036(c)(1), 20 AAC 25.036(c)(2), 20 AAC 25.036(c)(4)(H), 20 AAC 25.036(d), 20 AAC 25.280(b), 20 AAC 25.285(c)(2), 20 AAC 25.285(c)(3), 20 AAC 25.285(c)(9)(A), 20 AAC 25.285(c)(10), 20 AAC 25.285(f), 20 AAC 25.286(d)(1), 20 AAC 25.286(d)(3), 20 AAC 25.286(e).

DATE: October 9, 2006
Anchorage

Jody J. Colombie
Special Staff Assistant

SUBSCRIBED AND SWORN TO before me this 9th day of October, 2006.

Notary Public in and for the
State of Alaska
My commission expires: 11/11/06

ALASKA OIL AND GAS CONSERVATION COMMISSION MEETING
September 27, 2006
Excerpt From Unapproved Minutes

Commissioner Cathy P. Foerster moved and Commissioner Daniel T. Seamount, Jr. seconded the following motion:

"I move to adopt the amendments, specifically to 20 AAC 25.005(c)(4)(A), 20 AAC 25.035(e)(1), 20 AAC 25.035(e)(2), 20 AAC 25.035(e)(4), 20 AAC 25.035(e)(10), 20 AAC 25.036(c)(1), 20 AAC 25.036(c)(2), 20 AAC 25.036(c)(4)(H), 20 AAC 25.036(d), 20 AAC 25.280(b), 20 AAC 25.285(c)(2), 20 AAC 25.285(c)(3), 20 AAC 25.285(c)(9)(A), 20 AAC 25.285(c)(10), 20 AAC 25.285(f), 20 AAC 25.286(d)(1), 20 AAC 25.286(d)(3), 20 AAC 25.286(e), all of which pertain generally to the same subject as written in the September 27th draft of regulations."

The motion carried unanimously.

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

AFFIDAVIT OF COMMISSION ACTION

I, Jody J. Colombie, Special Staff Assistant for the Alaska Oil and Gas Conservation Commission, being duly sworn, state the following:

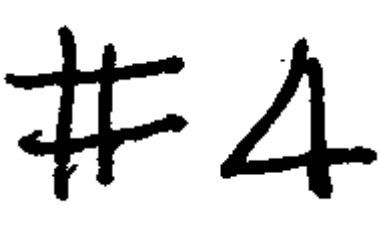
The attached motion dealing with the method of determining a well's maximum potential surface pressure and blowout prevention equipment regulation changes was passed by the Alaska Oil and Gas Conservation Commission during its September 27, 2006 meeting.

Date: October 9, 2006
Anchorage

Jody J. Colombie
Special Staff Assistant

SUBSCRIBED AND SWORN TO before me this 9th day of October 2006.

Notary Public in and for the
State of Alaska
My commission expires: 11/11/06.


#4

ALASKA OIL AND GAS CONSERVATION COMMISSION

Before Commissioners: John K. Norman, Chairman
Daniel T. Seamount
Cathy Foerster

Proposed Changes to Blow Out Prevention Equipment Regulations)
)
)

ALASKA OIL and GAS CONSERVATION COMMISSION
Anchorage, Alaska

August 31, 2006
9:00 o'clock a.m.

PUBLIC HEARING

BEFORE: John K. Norman, Chairman
Cathy Foerster, Commissioner

R & R COURT REPORTERS

811 G STREET
(907)277-0572/Fax 274-8982

ANCHORAGE, ALASKA 99501

PROCEEDINGS

Tape 1

0015

(On record - 9:00 a.m.)

CHAIRMAN NORMAN: Good morning. This is a hearing before the Alaska Oil and Gas Conservation Commission being held on the morning of Thursday, September 30th -- correction, September 31st [sic] at the hour of 9:00 o'clock a.m. The purpose of the hearing is to receive comments on the proposed amendments to the Commission's regulations pertaining to blow out prevention equipment, more specifically to the regulations found in 20 AAC 25.005 and forward. I will not read each of the specific amendments because they will be addressed in the course of these proceedings.

I'll first introduce myself, I'm John Norman, Chairman of the Commission. To my left is Commissioner Cathy Foerster, the Engineering Commissioner. Commissioner Dan Seamount is unable to be with us today, but we do have a quorum present and can proceed with this hearing.

In compliance with the Americans with Disabilities Act, if any persons have any special needs for accommodations to enable them to participate in this hearing or provide testimony, please, see the Commission's Special Assistant, Jody Columbie, and she will assist you. Ms. Columbie is in the back of the room, would you, please, hold your hand up, please, for

identification? Thank you.

Before we get into the testimony I'll remind everyone to, please, first identify yourself, your company affiliation if any, and your name clearly for the record. Also be sure to speak into the microphone so that those in the rear of the room can hear you. And also a transcript is being made of these proceedings and it will be important that the court reporter also be able to have clear testimony to prepare that record.

Notice of this hearing was published on July 28, 2006, in the Anchorage Daily News. Any persons desiring to see a copy of that notice can see the Commission's Special Assistant and that will be provided to you.

This hearing is proceeding in accordance with the general hearing regulations applicable to this Commission and those regulations are specifically found at 20 AAC 25.540 of the Alaska Administrative Code.

We have a sign up sheet and if there are any persons who wish to testify that have not signed up, we would appreciate you doing so.

I'll pause now and see if Commissioner Foerster has anything to add before we go forward?

COMMISSIONER FOERSTER: No.

CHAIRMAN NORMAN: Then we will first hear briefly from the Commission's staff concerning the regulations. Dr. Aubert?

DR. AUBERT: Thank you. For the record my name is Winton

Aubert, spelled W-i-n-t-o-n, last name A-u-b-e-r-t, and I'm on the Commission staff.

Before the Commission today are proposed changes to Title 20, Chapter 25 of the Alaska Administrative Code which I'll henceforth refer to either as Commission regulations or as AOGCC regulations. Also since a number of proposed changes today concern blow out prevention equipment I will refer to that equipment occasionally as BOP or BOPE or BOP equipment.

Our first proposed change is to Section 005 of the Commission regulations. We're proposing a straight forward change to the method by which a well's maximum anticipated surface pressure is calculated.

Our next series of changes are to Sections 035, 036, 285 and 286 of the Commission regulations. Current AOGCC regulations in these sections express blow out prevention equipment configurations in terms of required American Petroleum Institute or API pressure ratings of individual BOP components. Our proposed changes will express required blow out prevention equipment configurations in terms of a well's maximum potential surface pressure on which the equipment is installed.

We also propose amendments to Section 035, 036, 285 and 286 of the Commission regulations to one, clarify testing after use requirements of BOP equipment; second, to specify a time limit on reporting of BOP test results; and third, to codify an

area on which current regulations are silent, namely required testing of variable bore ram BOP equipment.

To conclude, we believe the present proposed changes to the Commission regs will reduce regulatory ambiguity and variations in interpretation, will reduce instances of regulatory noncompliance, will reduce the numbers of regulatory waivers and variances the Commission issues and will improve time utilization of Commission staff and Commission inspectors. We also believe that the proposed changes do not appreciably change the regulatory burden on Alaska's petroleum industry.

CHAIRMAN NORMAN: Thank you, Dr. Aubert.

DR. AUBERT: Thank you.

CHAIRMAN NORMAN: Commissioner Foerster?

COMMISSIONER FOERSTER: You said they don't appreciably increase, do they do anything to decrease the regulatory burden?

DR. AUBERT: They do not.

COMMISSIONER FOERSTER: Okay.

CHAIRMAN NORMAN: Thank you. And if you would remain available in case there are questions.

We have several persons testifying and I'm not sure if you've simply indicate you're here or if you wish to testify. So I will ask persons that wish to testify to, please, come forward and -- yes, Ms. Moriarty?

MS. MORIARTY: Good morning. My name is Kara Moriarty,

I'm the External Affairs Manager for the Alaska Oil and Gas Association. AOGA is a private, non-profit trade association whose member companies represent the majority of oil and gas exploration, production, transportation, refining and marketing in Alaska.

AOGA has reviewed the draft AOGCC regulation changes and we appreciate the opportunity to provide testimony and comment today. AOGA commends the Commission in its efforts to provide clarity and consistency to existing regulation.

We support the proposed regulation changes and would offer minor clarifications and additions. I'm going to give the Commissioners our packet of information now and then I'm going to ask Jerome Eggemeyer from ConocoPhilips Alaska and Harry Engel from B.P. to walk through the minor suggested clarifications and additions that we would like to propose.

CHAIRMAN NORMAN: Let the record reflect that a copy has been provided to both Commissioners and also a copy to the court reporter and this copy will be affixed to the transcript of this meeting.

Mr. Engel or Mr. Eggemeyer, which one of you wants to go first?

MR. ENGEL: Good morning, Commissioners Norman and Foerster. My name is Harry Engel. For the record, the last name is spelled E-n-g-e-l. I am a staff engineer for B.P. Exploration here in Anchorage and B.P. is a member of AOGA.

I also want to echo the comments made by Kara a few minutes ago regarding the effort by the AOGCC to modify these regulations. We do also agree that the effort provides clarity and consistency across Alaska with respect to BOP requirements in our industry.

Kara has provided a list of our comments, I can go through them with you in detail if you'd like and we'll start with the first recommendation in Section 25.005(c)(4)(a). We'd like to add a minor suggest -- a minor recommendation referring to the words, an equally effective means of determining. We'd recommend changing that to read, a more accurate means of determining the surface pressure. We think that would strengthen the regulation.

The next comment is in regard to wording related to requiring a stack of less than API 5K. Throughout the regulations there are sections in there where this remains unchanged and we would like to recommend that for consistency purposes that the language that's used which is, with a maximum potential surface pressure of 3,000 PSI which is used in the regulations, be used throughout the proposed regulations for consistency purposes. And we've identified the areas in which we feel that may be appropriate in the revised regulation.

The next comment we have is in regards to Section 25.035(e)(10)(c). And we suggest that the proposed language, if BOP equipment has been used, be clarified to state, if any

BOP equipment components have been used. We feel this will add some clarity into what component of the BOP equipment will be required in that section of the regulation.

The next comment is in relationship to the requirement for submitting test results to the Commission within two days which is the proposed amendment to the regulation. We would like to recommend that we change that to within a five day period to allow for weekend and holiday periods throughout the year and allow us time to submit the reports in a timely manner without being in noncompliance of the proposed regulation.

And I'll ask Jerome to address the next comment related to the addition of a subsequent regulation we'd like to propose to the Commission.

MR. EGGEMEYER: For the record, I'm Jerome Eggemeyer, last name's spelled, E-g-g-e-m-e-y-e-r, first name Jerome, J-e-r-o-m-e, employee for ConocoPhilips, Engineering Team Lead in the Drilling and Wells group. And I will address a couple other items with regard to the proposed regulation.

We have two suggested additions to the regulation. We have two suggested additions to the regulation. One addition would affect regulation -- Notice for Revision in the set of revisions in 20 AAC 25.035. We would suggest that a new subsection is inserted between (10)(e) and (10(f) and that would address testing of the ram bonnets after installing casing rams into the stack before casing is run.

CHAIRMAN NORMAN: Mr. Eggemeyer, so I can -- let's see, are you -- you're referring -- I'm looking at your handout and it's numbered at the bottom, so you're referring right now to page to 5, the subsection (f), is that -- is that what you're mentioning?

MR. EGGEMEYER: Page 5, item (f).....

CHAIRMAN NORMAN: Item (f). Okay. I'm with you.

MR. EGGEMEYER: .....about a third of the way down on the page.

CHAIRMAN NORMAN: Yes, I'm with you.

MR. EGGEMEYER: Yes.

CHAIRMAN NORMAN: Thank you.

MR. EGGEMEYER: And so that particular addition would say that after installing casing rams in the BOP stack the ram bonnets must be tested to the required pressure before running the casing. And this would just offer a clarification on that for -- for consistency and continuity. This is also consistent with language, I believe, used by the MMS which is one resource we used to see how this was addressed in other places.

Additionally, the -- another item -- other proposed addition to -- is to insert a new subsection 20 AAC 25.280(b)(6), to add a requirement to the Sundry notice application addressing the maximum surface pressure calculation. And on the handout that is towards the back, page 9, I believe. Okay. We suggest that the Commission apply the

surface pressure calculation concept articulated in the proposed revision, 25.05(c)(4)(a) [sic] to work over operations with additional wording to indicate that using stabilized shut-in tubing pressure may be -- may provide an alternative way that is acceptable to the Commission for determining the maximum potential surface pressure for proposed work over operations. Our suggested language is included in the handout which I think you're looking at there.

And if this suggested addition to the regulations does not fit within the scope of the proposed revisions then that would -- that has been publicly noticed so far, then that change could be considered on a future revision. So depending on order of business of how we can address that.

But that actually is a fairly important component just to add clarity for the work over sector. Otherwise we often end up falling back to the drilling rig to get guidance for that.

COMMISSIONER FOERSTER: Mr. Eggemeyer, the way I understand it, that revision will be included in a future revision to the regulations and we appreciate your comment and it will be addressed.

MR. EGGEMEYER: Okay. Great. Thank you.

CHAIRMAN NORMAN: Okay. Anything further?

MR. ENGEL: Yes, Commissioner Norman, I want to just clarify that we do have in our package this morning a reference of the MMS regulations referring to testing casing rams after

installation and before running casing as an amendment. And it's MMS regulation 30CFR Part 250, Subpart D, Oil and Gas Drilling Operations and it's Section .451, and it's attached for your reference in our package.

CHAIRMAN NORMAN: Yes, I think -- I see we have it right here.

MR. EGGEMEYER: Thank you.

CHAIRMAN NORMAN: Commissioner Foerster, any further questions of the witnesses? Dr. Aubert, was anything said in the testimony of these two witnesses that you feel would require some clarification? If there is, I'd ask that you come forward. If not, why I just want to give you the opportunity if they have any questions?

DR. AUBERT: No, but I would like to thank the AOGA representatives for their -- for their comments and suggestions which are very germane as usual.

CHAIRMAN NORMAN: Okay. The record will reflect that. I have only one question and that relates to the opinion of the Commission that this will not add to the regulatory burden on industry and included in that is added cost to industry. Is that your opinion of these regulations if they're adopted that they will not increase the costs or regulatory burden on the industry?

MR. ENGEL: Yes, Commissioner, I agree with that statement that we don't see any additional burden to industry in regards

to the regulation.

MR. EGGEMEYER: I would agree with that statement and actually I think it is a benefit because it offers clarity and less administration, less administervia (ph) I'll call it, in understanding what the best solution is whenever there is lack of clarity.

CHAIRMAN NORMAN: Yes. All right. Well, we thank you very much for taking your time to come in and offer comments on these regulations and this is an example of a good cooperative effort between the Commission and industry and the goal, of course, is to have a very safe and well-functioning oil industry operating in the state of Alaska.

So again we thank all of you and thank you, Ms. Moriarty. Do you have anything now to finish your testimony? Okay.

COMMISSIONER FOERSTER: I do. To prove to us that they're awake, the audience has pointed out that when we started the hearing we said that the date today was September 31st, but it's August 31st.

CHAIRMAN NORMAN: Thank you for that correction. We'll excuse you, gentlemen, and ask you to remain.

And I'll just ask generally now if there are any other persons present who wish to offer any comments on these regulations? Okay. The Chair sees no one asking to be recognized.

The regulations have been duly noticed, a quorum of

Commissioners is present to receive the testimony. And so we will now take your comments into consideration as well as any other information and then in due course there will be a subsequent hearing at which the Commission will vote formally to adopt these regulations. They will then be sent to Juneau to be filed with the Lieutenant Governor. And then following that there will be a new effective date and they'll become part of the regulations assuming that they are adopted.

COMMISSIONER FOERSTER: Can I move to adopt -- to adjourn the meeting, please?

CHAIRMAN NORMAN: It's been moved and without objection we are adjourned.

(Recessed - 9:25 a.m.)

0512

C E R T I F I C A T E

UNITED STATES OF AMERICA)
)ss.
STATE OF ALASKA)

I, Rebecca Nelms, Notary Public in and for the State of Alaska, residing at Anchorage, Alaska, and Reporter for R & R Court Reporters, Inc., do hereby certify:

THAT the annexed and foregoing Public Hearing Regarding Proposed Changes to Blow Out Prevention Equipment Regulations was taken by Lynn Hall on the 31st day of August, 2006, commencing at the hour of 9:00 a.m., at the Alaska Oil and Gas Conservation Commission, Anchorage, Alaska;

THAT this Hearing Transcript, as heretofore annexed, is a true and correct transcription of the proceedings taken and transcribed by Lynn Hall;

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal this 1st day of September 2006.

Rebecca Nelms
Notary Public in and for Alaska
My Commission Expires: 10/10/06

STATE OF ALASKA
OIL AND GAS CONSERVATION COMMISSION

Permits and Equipment Regulations Hearing
August 31, 2006 at 9:00 am

NAME – AFFILIATION (PLEASE PRINT)	ADDRESS/PHONE NUMBER	TESTIFY (Yes or No)
HARRY ENGEL	564-4194	YES
Kara Moriarty	272-1481	Yes
Jerome Eggemeyer	265-6049	Yes

Alaska Oil and Gas Association

AOGA

121 W. Fireweed Lane, Suite 207
Anchorage, Alaska 99503-2035
Phone: (907)272-1481 Fax: (907)279-8114
Email: brady@aoga.org
Judith Brady, Executive Director

August 30, 2006

Commissioner John Norman
Alaska Oil and Gas Conservation Commission
333 W. 7th Avenue, Suite 100
Anchorage, AK 99501-3539

Re: AOGA Comments on AOGCC Permit to Drill/BOPE Regulation Changes

Dear Commissioner Norman:

The Alaska Oil & Gas Association (AOGA) is a private non-profit trade association. Its member companies represent the majority of oil and gas exploration, production, transportation, refining and marketing activities in Alaska. AOGA has reviewed the draft Alaska Oil and Gas Conservation Commission (AOGCC) regulation changes and appreciates the opportunity to provide comment and testimony.

AOGA commends the AOGCC in its efforts to provide clarity and consistency to existing regulations. We support the proposed regulation changes, and would offer minor clarifications and additions. Following is a brief description of the changes we suggest, and the specific changes are shown in the attached redline document.

1. In the new language proposed for 20 AAC 25.005(c)(4)(A), line 5, we suggest revising the words "an equally effective means of determining . . ." to read "a more accurate means of determining . . ."

2. In the existing regulations, there are a couple of places where the wording "requiring a stack less than API 5k" remains unchanged by the proposed regulation revisions. Based on the consistent use of the phrase "with a maximum potential surface pressure of 3,000 psi or less" in the revised regulations, we suggest that all such references to the API 5k stack be revised to use the new proposed language. The regulations that would require additional changes to the new wording are at 20 AAC 25.035(e)(4)(H)(iii) and (iv) and 20 AAC 25.285(c)(10)(C) and (D).

3. In the proposed revision to 20 AAC 25.035(e)(10)(C), we suggest that the proposed language "if BOP equipment has been used . . ." be clarified to "if any BOP equipment components have been used . . ."

4. We propose changing the requirement of submitting BOPE test results to the Commission from "within two days" to "within five days." We believe that this timeframe is an acceptable timeframe for what is normally a non-urgent submission and allows for weekends and holidays without putting a party in non-compliance. This time requirement is found in proposed revised regulations 20 AAC 25.035(e)(10)(F), 20 AAC 25.036(d)(7), 20 AAC 25.285(f)(5), and 20 AAC 25.286(e)(6).

We have two suggested additions to the proposed regulations. One addition would affect a regulation noticed for revision in this set of revisions. In 20 AAC 25.035(e)(10), we suggest that a new subsection be inserted between (10)(E) and (10)(F), which would address testing the ram bonnets after installing casing rams, before running casing. The U.S. Minerals Management Service includes a similar requirement in its OCS regulations, a copy of which is attached to these comments. Suggested language is included in the attached redlined document.

The other proposed addition is to insert a new subsection, 20 AAC 25.280(b)(6), to add a requirement to the Sundry Notice application addressing the maximum surface pressure calculation. We suggest that the Commission apply the surface pressure calculation concept articulated in the proposed revision to 20 AAC 25.005(c)(4)(A) to workover operations, with additional wording to indicate that using a stabilized shut-in tubing pressure may provide an alternative way that is acceptable to the Commission for determining the maximum potential surface pressure for proposed workover operations. Suggested language is included in the attached redlined document. If this suggested addition to the regulations does not fit within the scope of the proposed revisions that have been publicly noticed for change at this time, we ask that this addition be considered for inclusion in a future revision of the Commission regulations.

Thank you for the opportunity to provide comment and testimony on these proposed revisions to the Commission's regulations.

Sincerely,

Judith Brady

Judith Brady
Executive Director

Enclosures (2) [redline; MMS reg]

20 AAC 25.005(c)(4)(A) is amended to read:

(A) the maximum downhole pressure that may be encountered, criteria used to determine it, and maximum potential surface **pressure based on a pressure gradient to surface of 0.1 psi per foot of true vertical depth, unless the commission approves a different pressure gradient that provides an ~~equally effective~~** more accurate **means of determining the maximum potential surface pressure** [METHANE GRADIENT];

(Eff. 4/13/80, Register 74; am 4/2/86, Register 97; am 11/7/99, Register 152; am 6/4/2000, Register 154; am 1/5/2006, Register 177; am ____/____/____, Register____)

Authority: AS 31.05.030 AS 31.05.090

20 AAC 25.035(e)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) or drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or** tubing [OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 3,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.035(e)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA **and** providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used.

20 AAC 25.035(e)(4) is amended to read:

(4) a BOPE assembly must include

(H) a choke manifold equipped with

(iii) immediately upstream of each choke, at least one full-opening valve for an operation with a maximum potential

surface pressure of 3,000 psi or less [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation requiring a BOP stack equal to or greater than API 5K; and

(iv) a bypass line, at least the diameter of the choke line, with at least one full-opening valve for an operation with a maximum potential surface pressure of 3,000 psi or less [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation requiring a BOP stack equal to or greater than API 5K;

20 AAC 25.035(e)(10) is amended to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if any BOP [SEALING RAM TYPE] equipment components haves been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the equipment** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be

function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest outside diameter (OD) and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(F) After installing casing rams in the BOP stack, the ram bonnets must be tested to the required pressure before running casing.

~~(F)~~**(G)** BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), **and must be provided to the commission, in a format approved by the commission, within ~~two~~ five days after completing the test;**

~~(G)~~**(H)** [(F)] at least 24 hours notice of each BOPE function pressure test must be provided to the commission so that a commission representative can witness the test;

History: Eff. 4/13/80, Register 74; am 2/22/81, Register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.036(c)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner, or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation **other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe or[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.036(c)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.036(d) is amended to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if BOP [SEALING RAM TYPE] equipment has been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the equipment** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BRA clears the BOP;

(6) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure**

on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

(7) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within ~~2~~ days after completing the test;**

(8) [(7)] at least 24 hours notice of each BOPE function pressure test must be provided to the commission so that a representative of the commission can witness the test.

History: Eff. 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

(b) The Application for Sundry Approval must set out

20 AAC 25.285(c)(2) is amended to read:

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, **liner** or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or**[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.285(c)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA **and** providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.285(c)(10) is amended to read:

(10) a choke manifold equipped with

(C) immediately upstream of each choke, at least one full-opening for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation requiring a BOP stack equal to or greater than API 5K; and

(D) a bypass line, at least two inches in nominal diameter, with at least one full-opening valve for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full opening valves for an operation requiring a BOP stack equal to or greater than API 5K.

20 AAC 25.285(f) is amended to read:

(f) The BOPE must be tested as follows:

(1) when installed, repaired, or changed, and at least once a week thereafter, BOPE, including emergency valves and choke manifolds, must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which the BOPE may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) if BOP [SEALING RAM TYPE] equipment has been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the equipment** [IT] must be function pressure-tested before the next wellbore entry, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which that equipment may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing

must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(5) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within five ~~two~~ days after completing the test;**

(6) [(5)] at least 24 hours notice of each **BOPE** function pressure test must be provided so that a representative of the commission can witness the test;[.]

(7) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

History: Eff. 4/2/86, Register 97; am 11/7/99, Register 152; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.286(d)(1) is amended to read:

(1) at least one positive seal manual or hydraulic valve or blind ram flanged to the wellhead or tree;

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi**

[REQUIRING A BOP STACK GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe or[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.286(d)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer; and

iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity

from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(B) for an operation with a maximum potential surface pressure of greater than 5,000 psi [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers; and

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

20 AAC 25.286(e) is amended to read:

(e) The operator shall test the BOPE assembly as follows:

(1) at least once a week, and after each [USE,] repair, [OR] change, **or use for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness,** BOP[E] **equipment** [PIPE AND BLIND RAMS] must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which they may be subjected, except that the annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) after each installation of BOPE or other well control equipment, the equipment must be pressure-tested, before wellbore entry, to the maximum potential wellhead pressure to which it may be subjected, except that when testing against the annular type preventer, pressure testing need not exceed 50 percent of the rated working pressure of the annular type preventer;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) after each well installation of the BOPE, the BOPE hydraulic connections to the rams must be visually verified before wellbore entry;[.]

(5) for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), and must be provided to the commission, in a format approved by the commission, within five ~~two~~ **days after completing the test;**

(7) at least 24 hours notice of each BOPE function pressure test must be provided so that a representative of the commission can witness the test;

(8) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

History: Eff. 11/7/99, Register 152; am____/____/____, Register ____)

Authority: AS 31.05.030

MMS regulation reference related to testing ram bonnets after installing casing rams.

MMS Regulations
30CFR Part 250
Subpart D Oil & Gas Drilling Operations

Sec. 250.451 What must I do in certain situations involving BOP equipment or systems?

The table in this section describes actions that lessees must take when certain situations occur with BOP systems during drilling activities.

If you encounter the following situation:	Then you must...
(f) Install casing rams in a BOP stack....	Test the ram bonnets before running casing.

20 AAC 25.005(c)(4)(A) is amended to read:

(A) the maximum downhole pressure that may be encountered, criteria used to determine it, and maximum potential surface **pressure based on a pressure gradient to surface of 0.1 psi per foot of true vertical depth, unless the commission approves a different pressure gradient that provides ~~an equally effective~~ means of determining the maximum potential surface pressure** [METHANE GRADIENT];

(Eff. 4/13/80, Register 74; am 4/2/86, Register 97; am 11/7/99, Register 152; am 6/4/2000, Register 154; am 1/5/2006, Register 177; am ____/____/____, Register____)

Authority: AS 31.05.030 AS 31.05.090

20 AAC 25.035(e)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) or drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or** tubing [OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 3,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.035(e)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, *stripper, or annular type preventer; and*

(iv) at least one preventer equipped with pipe rams that fit the size of tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA **and** providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used.

(4) a BOPE assembly must include

(H) a choke manifold equipped with

(iii) immediately upstream of each choke, at least one full-opening valve for an operation

[REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation requiring a BOP stack equal to or greater than API 5K; and

(iv) a bypass line, at least the diameter of the choke line, with at least one full-opening valve for an operation [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation requiring a BOP stack equal to or greater than API 5K;

20 AAC 25.035(e)(10) is amended to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP [SEALING RAM TYPE] equipment has been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the equipment** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be

function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after *the workstring is pulled out of the well and the BHA clears the BOP;*

(E) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest outside diameter (OD) and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(F) After installing casing rams in the BOP stack, the ram bonnets must be tested to the required pressure before running casing;

~~(F)~~ (G) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), **and must be provided to the commission, in a format approved by the commission, within ~~two~~ five days after completing the test;**

~~(G)~~ (H) [(F)] at least 24 hours notice of each BOPE function pressure test must be provided to the commission so that a commission representative can witness the test;

History: Eff. 4/13/80, Register 74; am 2/22/81, Register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.036(c)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner, or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation **other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe or[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.036(c)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.036(d) is amended to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if BOP [SEALING RAM TYPE] equipment has been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the equipment** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BRA clears the BOP;

(6) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure**

on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

(7) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), **and must be provided to the commission, in a format approved by the commission, within ~~2~~ days after completing the test;**

(8) [(7)] at least 24 hours notice of each BOPE function pressure test must be provided to the commission so that a representative of the commission can witness the test.

History: Eff. 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

(b) The Application for Sundry Approval must set out

20 AAC 25.285(c)(2) is amended to read:

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAT API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, **liner** or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation, **other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or**[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.285(c)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or *annular type preventer; and*

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA **and** providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or *annular type preventer; and*

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

***(iii) if pressure deployment of tools is planned, a riser or* lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;**

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.285(f) is amended to read:

(10) a choke manifold equipped with

(C) immediately upstream of each choke, at least one full-opening for an operation with a maximum potential surface pressure of 5,000 psi or less [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full-opening valves for an operation requiring a BOP stack equal to or greater than API 5K; and

(D) a bypass line, at least two inches in nominal diameter, with at least one full-opening valve for an operation with a maximum potential surface pressure of 5,000 psi or less [REQUIRING A BOP STACK LESS THAN API 5K], or at least two full opening valves for an operation requiring a BOP stack equal to or greater than API 5K.

20 AAC 25.285(f) is amended to read:

(f) The BOPE must be tested as follows:

(1) when installed, repaired, or changed, and at least once a week thereafter, BOPE, including emergency valves and choke manifolds, must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which the BOPE may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) if BOP [SEALING RAM TYPE] equipment has been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness**, **the equipment** [IT] must be function pressure-tested before the next wellbore entry, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which that equipment may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing

must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(5) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within** ~~two days after completing the test;~~

(6) [(5)] at least 24 hours notice of each **BOPE** function pressure test must be provided so that a representative of the commission can witness the test;[.]

(7) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

History: Eff. 4/2/86, Register 97; am 11/7/99, Register 152; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.286(d)(1) is amended to read:

(1) at least one positive seal manual or hydraulic valve or blind ram flanged to the wellhead or tree;

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi**

[REQUIRING A BOP STACK GREATER THAN API 5K], at least four preventers, including

(i) *two equipped with pipe rams that fit the size of the drill* pipe or[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.286(d)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer; and

iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity

from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(B) for an operation with a maximum potential surface pressure of greater than 5,000 psi [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers; and

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

20 AAC 25.286(e) is amended to read:

(e) The operator shall test the BOPE assembly as follows:

(1) at least once a week, and after each [USE,] repair, [OR] change, **or use for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness,** BOP[E] **equipment** [PIPE *AND BLIND RAMS] must be function pressure-tested, using a non-compressible* fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which they may be subjected, except that the annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) after each installation of BOPE or other well control equipment, the equipment must be pressure-tested, before wellbore entry, to the maximum potential wellhead pressure to which it may be subjected, except that when testing against the annular type preventer, pressure testing need not exceed 50 percent of the rated working pressure of the annular type preventer;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) after each well installation of the BOPE, the BOPE hydraulic connections to the rams must be visually verified before wellbore entry;[.]

(5) for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), and must be provided to the commission, in a format approved by the commission, within ~~two~~ days after completing the test;

(7) at least 24 hours notice of each BOPE function pressure test must be provided so that a representative of the commission can witness the test;

(8) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

History: Eff. 11/7/99, Register 152; am____/____/____, Register ____)

Authority: *AS 31.05.030*

MMS regulation reference related to testing ram bonnets after installing casing rams.

MMS Regulations
30CFR Part 250
Subpart D Oil & Gas Drilling Operations

Sec. 250.451 What must I do in certain situations involving BOP equipment or systems?

The table in this section describes actions that lessees must take when certain situations occur with BOP systems during drilling activities.

If you encounter the following situation:	Then you must...
(f) Install casing rams in a BOP stack....	Test the ram bonnets before running casing.

Subject: [Fwd: Tomorrow's Public Hearing]
From: John Norman <john_norman@admin.state.ak.us>
Date: Tue, 29 Aug 2006 16:29:38 -0800
To: Jody J Colombie <jody_colombie@admin.state.ak.us>

-------- Original Message --------
Subject: Tomorrow's Public Hearing
Date: Tue, 29 Aug 2006 13:15:36 -0800
From: Kara Moriarty <moriarty@aoga.org>
Reply-To: moriarty@aoga.org
Organization: Alaska Oil & Gas Association
To: 'John Norman' <john_norman@admin.state.ak.us>, 'Dan Seamount' <dan_seamount@admin.state.ak.us>, 'Cathy Foerster' <cathy_foerster@admin.state.ak.us>

TO: AOGCC Commissioners

I will be unable to attend your monthly meeting tomorrow due to a conflict here at our office.

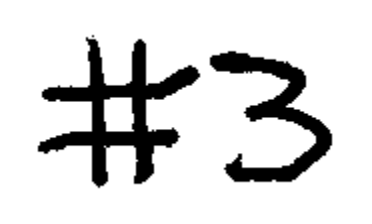
I did want to let you know that AOGA will be providing supporting comments and testimony at the hearing on August 31 in regards to the proposed regulation changes. We appreciate the Commission's efforts in providing clarity to these regulations. We will be offering additional minor edits and suggestions for your consideration, and we will review these suggestions in testimony and in writing. Industry folks have discussed these proposed minor edits and suggestions with AOGCC staff.

I look forward to seeing you all on Thursday.

Kara

Kara Moriarty
External Affairs Manager
Alaska Oil & Gas Association
121 W. Fireweed Lane, #207
Anchorage, AK 99503
(907) 272-1481
Cell: (907) 441-5272
Fax: (907)279-8114
moriarty@aoga.org

John K. Norman <John_Norman@admin.state.us>
Chairman
Alaska Oil & Gas Conservation Commission


#3

MEMORANDUM

State of Alaska
Department of Law

To: John K.Norman, Chair
Alaska Oil and Gas
Conservation Commission
Dept. of Administration

Date: July 28, 2006

File No.: 993-07-0029

Tel. No.: 465-3600

From: Deborah E. Behr
Chief Assistant Attorney General
and Regulations Attorney
Legislation and Regulations Section

Re: Regulations File Opening Re:
AOGCC: Permits and
Equipment
(20 AAC 25.005 - .286)

We have received your memorandum of July 26, 2006 regarding this project, along with a copy of the proposed regulations and related documents. The project has been assigned to Assistant Attorney General Cammy Taylor, phone number 269-5100.

Our department's file number for this project is 993-07-0029. This file number should be used on any further correspondence pertaining to this project.

DEB:pvp

cc: Kevin Brooks, Regulations Contact
Dept. of Administration

Lauren Yocom, AAC Coordinator
Lt. Governor's Office

Larry Ostrovsky, Supervising Attorney
Oil, Gas and Mining Section

Cammy Taylor, Assistant Attorney General
Anchorage

MEMORANDUM STATE OF ALASKA

ALASKA OIL AND GAS CONSERVATION COMMISSION

TO: Deborah E. Behr
Assistant Attorney General
And Regulations Attorney
Legislation and Regulations Section

DATE: July 26, 2006

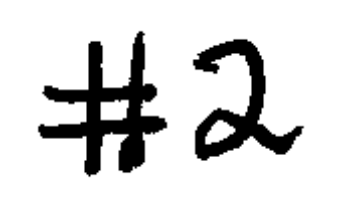
SUBJECT: File-opening request for Regulations Project on Permit to Drill Requirements and Blowout Prevention Equipment Requirements
20 AAC 25.005(c)(4)(A)
20 AAC 25.035(e)(1)
20 AAC 25.035(e)(2)
20 AAC 25.035(e)(10),
20 AAC 25.036(c)(1),
20 AAC 25.036(c)(2),
20 AAC 25.036(d),
20 AAC 25.285(c)(2)
20 AAC 25.285(c)(3)
20 AAC 25.285(f)
20 AAC 25.286(d)(1)
20 AAC 25.286(d)(3)
20 AAC 25.286(e)

FROM: John K. Norman
Regulations Contact
Department of Administration

We are requesting that you open a new file for a regulations project regarding changes in Title 20, Chapter 25, of the Alaska Administrative Code, dealing with Permit to Drill requirements and blowout prevention equipment requirements for the Alaska Oil and Gas Conservation Commission.

Enclosed is a copy of the public notice, Additional Regulations Notice Information, and a draft of the regulation.

Please assign Assistant Attorney General Cammy Taylor to this project. Our contact person for the project is Jody Colombie at 793-1221.


#2

STATE OF ALASKA

ADVERTISING ORDER

SEE BOTTOM FOR INVOICE ADDRESS

NOTICE TO PUBLISHER

INVOICE MUST BE IN TRIPLICATE SHOWING ADVERTISING ORDER NO., CERTIFIED AFFIDAVIT OF PUBLICATION (**PART 2 OF THIS FORM**) WITH ATTACHED COPY OF ADVERTISEMENT MUST BE SUBMITTED WITH INVOICE

ADVERTISING ORDER NO.

AO-02714001

FROM	AOGCC 333 W 7th Ave, Ste 100 Anchorage, AK 99501 -
TO	Anchorage Daily News PO box 149001 Anchorage, AK 99514

AGENCY CONTACT: Jody Colombie

PHONE: (907) 793 –1221

DATE OF A.O.: July 26, 2006

PCN:

DATES ADVERTISEMENT REQUIRED: July 28, 2006

THE MATERIAL BETWEEN THE DOUBLE LINES MUST BE PRINTED IN ITS ENTIRETY ON THE DATES SHOWN.

SPECIAL INSTRUCTIONS: Advertisement to be published was e-mailed

Type of Advertisement Legal ☒ ☐ Display Classified ☐ Other (Specify)

SEE ATTACHED

SEND INVOICE IN TRIPLICATE TO AOGCC, 333 W. 7th Ave., Suite 100 Anchorage, AK 99501

PAGE 1 OF 2 PAGES

TOTAL OF ALL PAGES$

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1	VEN				
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4					

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STATE OF ALASKA ADVERTISING ORDER SEE BOTTOM FOR INVOICE ADDRESS	NOTICE TO PUBLISHER INVOICE MUST BE IN TRIPLICATE SHOWING ADVERTISING ORDER NO., CERTIFIED AFFIDAVIT OF PUBLICATION (**PART 2 OF THIS FORM**) WITH ATTACHED COPY OF ADVERTISEMENT MUST BE SUBMITTED WITH INVOICE	ADVERTISING ORDER NO. **AO-02714001**

FROM	AOGCC 333 West 7th Avenue. Suite 100 Anchorage, AK 99501 907-793-1221	AGENCY CONTACT Jody Colombie PHONE (907) 793 -1221	DATE OF A.O. July 26, 2006 PCN
TO	Anchorage Daily News PO box 149001 Anchorage, AK 99514	DATES ADVERTISEMENT REQUIRED: July 28, 2006 THE MATERIAL BETWEEN THE DOUBLE LINES MUST BE PRINTED IN ITS ENTIRETY ON THE DATES SHOWN. SPECIAL INSTRUCTIONS: Account # STOF0330	

AFFIDAVIT OF PUBLICATION

United states of America

State of _____ ss

_____ division.

Before me, the undersigned, a notary public this day personally appeared

_____ who, being first duly sworn, according to law, says that

he/she is the _____ of _____

Published at _____ in said division _____and

state of _____ and that the advertisement, of which the annexed

is a true copy, was published in said publication on the _____ day of

_____ 2005, and thereafter for ____ consecutive days, the last

publication appearing on the _____ day of _____, 2005, and that

the rate charged thereon is not in excess of the rate charged private

individuals.

Subscribed and sworn to before me

This ____ day of _____ 2005,

_____

Notary public for state of _____

My commission expires _____

REMINDER

INVOICE MUST BE IN TRIPLICATE AND MUST REFERENCE THE ADVERTISING ORDER NUMBER.

A CERTIFIED COPY OF THIS AFFIDAVIT OF PUBLICATION MUST BE SUBMITTED WITH THE INVOICE.

ATTACH PROOF OF PUBLICATION HERE.

Subject: [Fwd: Re: Public Notice]
From: Ceresa Tolley <ceresa_tolley@admin.state.ak.us>
Date: Thu, 27 Jul 2006 15:49:19 -0800
To: Jody J Colombie <jody_colombie@admin.state.ak.us>

-------- Original Message --------
Subject: Re: Public Notice
Date: Thu, 27 Jul 2006 11:30:00 -0800
From: Ads, Legal <legalads@adn.com>
To: Ceresa Tolley <ceresa_tolley@admin.state.ak.us>

Hello Ceresa:

Following is the confirmation information on your legal notice. Please review and let me know if you have any questions or need additional information.

Account Number: STOF 0330

Legal Ad Number: 889675

Publication Date(s): July 28, 2006

Your Reference Number: 02714001

Cost of Legal Notice: $270.18

Thank You,
Kim Kirby
Anchorage Daily News
Legal Classified Representative
E-Mail: legalads@adn.com
Phone: (907) 257-4296
Fax: (907) 279-8170

On 7/26/06 4:09 PM, "Ceresa Tolley" <ceresa_tolley@admin.state.ak.us> wrote:

> Please publish on 7/28/06.
>
> Jody Colombie

Mary Jones
XTO Energy, Inc.
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810 Houston Street, Ste 2000
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Anchorage, AK 99503

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Anchorage, AK 99508-4336

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Ivan Gillian
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Anchorage, AK 99507

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Kenai National Wildlife Refuge
Refuge Manager
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Soldotna, AK 99669-2139

Cliff Burglin
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Fairbanks, AK 99707

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Arctic Slope Regional Corporation
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Mona Dickens
Tesoro Refining and Marketing Co.
Supply & Distribution
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Richard Neahring
NRG Associates
President
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Colorado Springs, CO 80901

Michael Parks
Marple's Business Newsletter
117 West Mercer St, Ste 200
Seattle, WA 98119-3960

Baker Oil Tools
4730 Business Park Blvd., #44
Anchorage, AK 99503

Jill Schneider
US Geological Survey
4200 University Dr.
Anchorage, AK 99508

Darwin Waldsmith
PO Box 39309
Ninilchick, AK 99639

Penny Vadla
399 West Riverview Avenue
Soldotna, AK 99669-7714

Bernie Karl
K&K Recycling Inc.
PO Box 58055
Fairbanks, AK 99711

Mailed 7.26.06

Subject: Public Notice
From: Ceresa Tolley <ceresa_tolley@admin.state.ak.us>
Date: Wed, 26 Jul 2006 16:09:46 -0800
To: legalads@adn.com

Please publish on 7/28/06.

Jody Colombie

Ceresa Tolley <ceresa_tolley@admin.state.ak.us>
Staff Assistant 907-793-1238
Alaska Oil & Gas Conservation Commission
Department of Administration

Ad Order form.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Permit to Drill, BOPE notice.doc	**Content-Type:** application/msword **Content-Encoding:** base64

Subject: Public Notice, Additional Regulation Notice Information and Amended Regulations Permit to Drill and BOPE
From: Jody Colombie <jody_colombie@admin.state.ak.us>
Date: Wed, 26 Jul 2006 14:08:28 -0800
To: undisclosed-recipients:;
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File Opening Memo, Copy of Notice, Additional Regulations Notice Information, draft regulation was mailed to the following on July 26, 2006.

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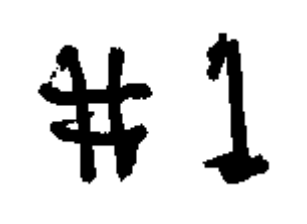
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20 AAC 25.005(c)(4)(A) is amended to read:

(A) the maximum downhole pressure that may be encountered, criteria used to determine it, and maximum potential surface **pressure based on a pressure gradient to surface of 0.1 psi per foot of true vertical depth, unless the commission approves a different pressure gradient that provides an equally effective means of determining the maximum potential surface pressure** [METHANE GRADIENT];

(Eff. 4/13/80, Register 74; am 4/2/86, Register 97; am 11/7/99, Register 152; am 6/4/2000, Register 154; am 1/5/2006, Register 177; am ____/____/____, Register____)

Authority: AS 31.05.030 AS 31.05.090

20 AAC 25.035(e)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) or drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or** tubing [OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

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(C) for a casing or liner operation with a maximum potential surface pressure of greater than 3,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.035(e)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA **and** providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used.

20 AAC 25.035(e)(10) is amended to read:

(10) the BOPE must be tested as follows:

(A) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50

percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(B) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(C) if BOP [SEALING RAM TYPE] equipment has been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the equipment** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(D) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(E) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest outside diameter (OD) and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(F) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), **and must be provided to the commission, in a format approved by the commission, within two days after completing the test;**

(G) [(F)] at least 24 hours notice of each BOPE function pressure test must be provided to the commission so that a commission representative can witness the test;

History: Eff. 4/13/80, Register 74; am 2/22/81, Register 77; am 4/2/86, Register 97; am 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.036(c)(1) is amended to read:

(1) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], BOPE must have at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner, or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation **other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K], BOPE must have at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe or[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, BOPE must have at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.036(c)(2) is amended to read:

(2) in coiled tubing unit operations, the well control equipment must include

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools, tubing, liner, or casing is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.036(d) is amended to read:

(d) A BOPE assembly must be tested as follows:

(1) when installed, repaired, or changed on a development or service well and at time intervals not to exceed each 14 days thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure; however, the commission will require that the BOPE be function pressure-tested weekly, if the commission determines that a weekly BOPE pressure test interval is indicated by a particular drilling rig's BOPE performance;

(2) when installed, repaired, or changed on an exploratory or stratigraphic test well and at least once a week thereafter, BOPE, including kelly valves, emergency valves, and choke manifolds, must be function pressure-tested to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) other well control equipment must be pressure-tested to the maximum potential wellhead pressure after each installation of the well control equipment and before wellbore entry, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(4) if BOP [SEALING RAM TYPE] equipment has been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness, the equipment** [IT] must be function pressure-tested, before the next wellbore entry, to the required working pressure specified in the approved Permit to Drill, using a non-compressible fluid, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(5) BOP ram and annular components except blind rams must be function-tested weekly, and all BOP ram and annular components must be function-tested after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing of blind rams must be performed as soon as possible after the workstring is pulled out of the well and the BRA clears the BOP;

(6) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(7) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within 2 days after completing the test;**

(8) [(7)] at least 24 hours notice of each BOPE function pressure test must be provided to the commission so that a representative of the commission can witness the test.

History: Eff. 11/7/99, Register 152; am 10/24/2004, Register 172; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.285(c)(2) is amended to read:

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 3,000 psi or less** [REQUIRING A BOP STACK LESS THAT API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, **liner** or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi** [REQUIRING A BOP STACK EQUAL TO OR GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe **or**[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation, with a maximum potential surface pressure of greater than 3,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.285(c)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing, liner, or casing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA **and** providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(iv) at least two preventers equipped with pipe rams that fit the size of the tubing[, LINER, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi,

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers;

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

(iv) at least one preventer equipped with pipe rams that fit the size of the tubing being used, except that pipe rams need not be sized to BHAs and drill collars; and

(v) at least one preventer equipped with pipe rams that fit the size of casing or liner being used;

20 AAC 25.285(f) is amended to read:

(f) The BOPE must be tested as follows:

(1) when installed, repaired, or changed, and at least once a week thereafter, BOPE, including emergency valves and choke manifolds, must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which the BOPE may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) if BOP [SEALING RAM TYPE] equipment has been used **for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness**, **the equipment** [IT] must be function pressure-tested before the next wellbore entry, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which that equipment may be subjected, except that an annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) **for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;**

(5) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1)**, and must be provided to the commission, in a format approved by the commission, within two days after completing the test;**

(6) [(5)] at least 24 hours notice of each **BOPE** function pressure test must be provided so that a representative of the commission can witness the test;[.]

(7) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

History: Eff. 4/2/86, Register 97; am 11/7/99, Register 152; am____/____/____, Register ____)

Authority: AS 31.05.030

20 AAC 25.286(d)(1) is amended to read:

(1) at least one positive seal manual or hydraulic valve or blind ram flanged to the wellhead or tree;

(2) in rotary drilling rig operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K], at least three preventers, including

(i) one equipped with pipe rams that fit the size of drill pipe, tubing, liner or casing being used, except that pipe rams need not be sized to bottom-hole assemblies (BHAs) and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type; and

(B) for an operation**, other than a casing or liner operation, with a maximum potential surface pressure of greater than 5,000 psi** [REQUIRING A BOP STACK GREATER THAN API 5K], at least four preventers, including

(i) two equipped with pipe rams that fit the size of the drill pipe or[,] tubing[, OR CASING] being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iii) one annular type;

(C) for a casing or liner operation with a maximum potential surface pressure of greater than 5,000 psi, at least four preventers, including

(i) one equipped with pipe rams that fit the size of the drill pipe or tubing being used, except that pipe rams need not be sized to BHAs and drill collars;

(ii) one equipped with pipe rams that fit the size of casing or liner being used;

(iii) one with blind rams, except that a subsea BOPE assembly must have blind/shear rams in place of blind rams; and

(iv) one annular type;

20 AAC 25.286(d)(3) is amended to read:

(3) in coiled tubing unit operations,

(A) for an operation **with a maximum potential surface pressure of 5,000 psi or less** [REQUIRING A BOP STACK EQUAL TO OR LESS THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) a high pressure pack-off, stripper, or annular type preventer; and

iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer; and

(B) for an operation with a maximum potential surface pressure of greater than 5,000 psi [REQUIRING A BOP STACK GREATER THAN API 5K],

(i) BOPE rams providing for pipe, slip, cutting, and blinding operations on the coiled tubing in service;

(ii) two high pressure pack-offs, strippers, or annular type preventers; and

(iii) if pressure deployment of tools is planned, a riser or lubricator sized to the BHA and providing for pressure integrity from the BOPE rams to the high pressure pack-off, stripper, or annular type preventer;

20 AAC 25.286(e) is amended to read:

(e) The operator shall test the BOPE assembly as follows:

(1) at least once a week, and after each [USE,] repair, [OR] change, **or use for well control or other equivalent purpose, or when routine use of the equipment may have compromised its effectiveness,** BOP[E] **equipment** [PIPE AND BLIND RAMS] must be function pressure-tested, using a non-compressible fluid, to the required working pressure specified in an approved Application for Sundry Approvals under 20 AAC 25.280 or, if that application is not required, to the maximum potential surface pressure to which they may be subjected, except that the annular type preventer need not be tested to more than 50 percent of its rated working pressure;

(2) after each installation of BOPE or other well control equipment, the equipment must be pressure-tested, before wellbore entry, to the maximum potential wellhead pressure to which it may be subjected, except that when testing against the annular type preventer, pressure testing need not exceed 50 percent of the rated working pressure of the annular type preventer;

(3) non-sealing equipment must be function-tested weekly, after a repair or change, and after an action that disconnects the hydraulic system lines from the BOPE, except that if the workstring is continuously in the well, function-testing must be performed as soon as possible after the workstring is pulled out of the well and the BHA clears the BOP;

(4) after each well installation of the BOPE, the BOPE hydraulic connections to the rams must be visually verified before wellbore entry;[.]

(5) for each BOPE test during drilling and completion operations, variable bore rams must be function pressure tested to the required pressure on the smallest OD and largest OD tubulars that may be used during that test cycle, except that variable bore rams need not be tested on BHAs and drill collars;

(6) BOPE test results must be recorded as part of the daily record required by 20 AAC 25.070(1), and must be provided to the commission, in a format approved by the commission, within two days after completing the test;

(7) at least 24 hours notice of each BOPE function pressure test must be provided so that a representative of the commission can witness the test;

(8) the operator shall report to the commission within 24 hours any instance of BOPE use to prevent the flow of fluids from a well.

History: Eff. 11/7/99, Register 152; am____/____/____, Register ____)

Authority: AS 31.05.030